

Delio Batista, Carlos Lopez, Mariana Lopez, Rafaela Valiente vs Avant Assurance
Cortes, Reinier on 04/11/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:22-CV-22671-ALTONAGA/TORRES

DELIO BATISTA, CARLOS LOPEZ,
MARIANA LOPEZ, and RAFAELA VALIENTE,

Plaintiffs,

vs.

AVANT ASSURANCE INC., REINIER CORTES,
and ANDREA GONZALEZ QUINTERO,

Defendants.

DEPOSITION OF REINIER CORTES
TAKEN ON BEHALF OF THE PLAINTIFFS

APRIL 11, 2023
10:04 A.M. TO 02:20 P.M.

ALL PARTIES APPEARED REMOTELY
PURSUANT TO
FLORIDA SUPREME COURT ORDER AOSC20-23

REPORTED BY:
ASHLEY CRAFT, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA



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VIDEOTAPE DEPOSITION OF REINIER CORTES

APRIL 11, 2023

THE COURT REPORTER: Good morning. We are now on the record. We are here today April 11th, 2023. The time is approximately 10:04 a.m.

We are here for the video deposition of Reinier Cortes in the matter of Delio Batista, Carlos Lopez, Mariana Lopez, and Rafaela Valiente vs. Avant Assurance Incorporated, Reinier Cortes and Andrea Gonzalez Quintero. Case number for that is 1:22-CV-22671-Altonaga-Torres.

The Court Reporter for today is Ashley Craft with Universal Court Reporting.

Would Counsels please introduce themselves for the record?

MR. CUMMINGS: Toussaint Cummings on behalf of Plaintiffs.

MR. CUETO: Santiago Cueto on behalf of the Defendants.

THE COURT REPORTER: Thank you, Counsel. Thereupon:

REINIER CORTES

was called as a witness, and after having been first duly sworn, testified as follows:

DIRECT EXAMINATION

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BY MR. CUMMINGS:

Q Good morning. Mr. Cortes, have you ever taken a deposition before?

A No, first time.

Q All right. So, let me just go over some basic rules of a deposition and then we can get started.

All right. So, the most important rules for a deposition are that we have to be respectful to the Court Reporter, so we cannot speak at the same time.

The Court Reporter is typing down everything that -- all of my questions to you and then all of your answers.

So, we need to have a very clear question line and a very clear answer line because a little booklet is going to be printed up afterwards called the deposition transcript, and that transcript cannot be confusing.

So, if you start to, you know, a lot of times depositions can get kind of conversational in nature, and I might be asking you a question and you think you know where I'm going with it.

So, if you jump ahead of me, then the Court Reporter is going to have, you know, not a complete question from me. So, in that case, what I'll do is I'll repeat my question and allow you to answer, okay?

A Okay.

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Q All right. Same thing, sometimes I might cut you off by accident and then I'll stop myself, I'll let you -- I'll repeat the question, so that we can have a clear question and answer, all right?

A Okay.

Q All right. Other than that, you always have to provide a verbal response. Again, the Court Reporter is typing down everything we say.

So, if you shake your head or you provide a non-verbal response, the Court Reporter cannot write that down. So, I'll ask the question again and just remind you, please provide a verbal response.

Understood?

A Okay.

Q Okay. All right. And the same thing for yeses and nos. If you say, uh-uh or uh-huh, that doesn't necessarily mean anything when it's written down, so I'll ask you to give a yes or a no answer.

Understood?

A Okay.

Q Okay. All right. Other than that, is there any reason why you cannot take a deposition today?

A No, I'm just a little bit under the influence, but I think I'm fine to go for a couple of hours.

Q Okay. What do you mean by that?

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A No, if you see me sneezing or coughing.

Q Okay. All right. Because normally when --

A Yeah, just for you to be aware, you know.

Q Yeah, normally when people say under the influence they're talking about drugs or alcohol. You're not referring to drugs or alcohol, were you?

A No, the influence of like minor cold, I would say.

Q Okay. Understood. All right. And, do you understand that the Court Reporter just swore you in under oath to tell the truth?

A Correct.

Q All right. So, we're not in a courtroom setting, obviously we're over Zoom, I'm in my office, I'm assuming you're wherever you are in your office, but because you are sworn under oath to tell the truth, even though we're not in a courtroom setting, I want to remind you that you always have to tell the truth no matter what the question is, that's whether you don't remember or you do remember, understood?

A Correct.

Q All right. Let's get started. What is your full name, including middle name?

A Reinier Cortes Porras.

Q Can you please spell the last name that you

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1 said?
2 A P-O-R-R-A-S.
3 Q What's your date of birth?
4 A November 25th, 1984.
5 Q What is your current address?
6 A Current address, residential address, right?
7 Q Correct.
8 A Okay. 8405 Northwest 34 Drive, Doral, Florida
9 33122.
10 Q 33122.
11 A Correct.
12 Q What's your current phone number?
13 A (305) 332-8317.
14 Q And are you married?
15 A Yes.
16 Q Who are you married to?
17 A Andrea Gonzalez.
18 MR. CUETO: And this is a -- and I just want
19 to make clear, this is a corporate representative
20 depo, not -- he's not here in his individual
21 capacity.
22 MR. CUMMINGS: Excuse me. Okay. This is the
23 corporate rep depo?
24 MR. CUETO: Yes, it is. That's what it was
25 noticed for.



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1 MR. CUMMINGS: Got it. Hold on for a second.
2 All right. So, do you want me to call him back in
3 his individual capacity?
4 MR. CUETO: You can, after this deposition,
5 you can, if you're finished.
6 MR. CUMMINGS: Well, what I'm saying is, I
7 could always just distinguish between, which
8 questions are for corporate rep and which questions
9 are for corporate capacity.
10 But what I'm asking is, do you want us to
11 notice him for his individual capacity?
12 MR. CUETO: Yeah, I just think that's
13 confusing. He was only noticed today for the
14 corporate capacity, so we've only talked about him
15 testifying in his corporate capacity.
16 MR. CUMMINGS: Okay. That's no problem. All
17 right. We'll just call him back.
18 BY MR. CUMMINGS:
19 Q All right. Mr. Cortes, where do you currently
20 work?
21 A Avant Assurance.
22 Q Okay. Do you have any other jobs?
23 A Any other?
24 Q Yeah.
25 A No.



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1 Q What is your position at Avant Assurance?
2 A CEO.
3 Q How long have you been the CEO of Avant?
4 A Since the company was formed.
5 Q When was that?
6 A 2020.
7 Q Is Avant considered a brokering agent?
8 A Considered what?
9 Q A brokering agent.
10 A What does that mean?
11 Q What is Avant Assurance?
12 A It's an insurance agency.
13 Q All right. And what licenses do you need to
14 operate an insurance agency?
15 A Insurance license.
16 Q Whose name is on the insurance license?
17 A The company.
18 Q And does somebody have to apply for the
19 insurance license?
20 A If somebody else had to apply for the
21 insurance license, I don't understand that question.
22 Q Listen to the question. Did somebody have to
23 apply for the insurance license for Avant?
24 A If somebody asked me to apply?
25 Q Did somebody apply for an insurance license



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1 for Avant?
2 A Yes, it was me.
3 Q Okay. So, is your name on the insurance
4 license for Avant?
5 A No, Avant has it's own insurance license.
6 Q Okay. And who's the agent in charge for Avant?
7 A I am.
8 Q What's the physical address of Avant
9 Assurance?
10 A What's the address for the company?
11 Q Yes.
12 A Okay. It's, 3470 Northwest 82nd Avenue, Suite
13 700, Doral, Florida 33122.
14 Q What types of insurance does Avant sell?
15 A Health insurance.
16 Q And what insurance companies is Avant
17 appointed with?
18 A I wouldn't recall all the names, to be honest
19 with you.
20 Q Okay. Which ones do you recall?
21 A There's one that is called Oscar, Cigna,
22 United Healthcare, Ambetter, and I'm sure there's
23 others. I don't have the list on top of my head right
24 now.
25 Q Okay. So, the first one you said was Oscar



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1 O-S-C-A-R?
2 A Correct.
3 Q Cigna is that with a S or a C?
4 A C as in Charlie.
5 Q Okay. C-I-G-N-A?
6 A Correct.
7 Q And then Ambetter is A-M-B-E-T-T-E-R?
8 A Yes.
9 Q Okay. I know you don't remember all of the
10 insurance companies, but about how many insurance
11 companies is Avant appointed with?
12 A I would say around 8 or 10.
13 Q And how does Avant Assurance become appointed
14 with an insurance company? What's the process?
15 A So, you have to send an inquiry to each of the
16 companies and basically present the business plan, and
17 if they accept it, they may issue a contract.
18 Q Who's responsible for sending inquiries to the
19 insurance companies?
20 A That would be me.
21 Q Does Avant sell insurance for any companies
22 that it is not appointed by?
23 A If Avant sell insurance what?
24 Q Does Avant sell insurance for any companies
25 that it is not appointed by or with?



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1 A No.
2 Q Okay. Let me -- does Avant keep a brokering
3 agent register?
4 A I'm not sure, what is that?
5 Q Okay. All right. Does Avant have sales
6 agents that work for it?
7 A That work for Avant?
8 Q Yes.
9 A How would you define work, that produce for
10 Avant?
11 Q How would you define work?
12 A It depends. We have employees and there's
13 independent contractors.
14 Q Okay. So, you currently have employees and
15 currently have independent contractors?
16 A Correct.
17 Q Have you always had employees and independent
18 contractors since 2020?
19 A No.
20 Q Okay. In 2020, when Avant first formed, what
21 types of people were working for Avant?
22 A Everybody was 1099.
23 Q Who is Jennifer Manjarres?
24 A Jennifer Manjarres, she's an employee.
25 Q How long has she worked with Avant?



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1 A Less than a year.
2 Q Who hired Ms. Manjarres?
3 A I did.
4 Q Did you know her before she started working
5 for Avant Assurance?
6 A Yes.
7 Q How did you know her before?
8 A We used to work at a previous employer before.
9 Q What employer was that?
10 A It was called Hola, but I don't recall the
11 whole name.
12 Q What type of business was it?
13 A It was an insurance agency.
14 Q Okay. How do you spell it? Did you say Ola
15 O-L-A?
16 A H-O-L-A.
17 Q Hola, okay. And what is Ms. Manjarres' job at
18 Avant?
19 A She is the executive office manager.
20 Q What are her job responsibilities?
21 A Basically, day to day pick up of the mail and
22 helping with my appointments, setting up my
23 appointments, making sure that we have office supplies,
24 water, for example, that's an example of office
25 supplies, you know.



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1 Q Okay.
2 A Pretty basic.
3 Q Okay. Who is Alix Ledsma?
4 A Alix Ledsma?
5 Q Yes.
6 A She also works with us.
7 Q All right. And just to go back for a second,
8 for the Court Reporter, Jennifer Manjarres is going to
9 be -- the last name is M-A-N-J-A-R-R-E-S. And then
10 Alix -- Mr. Cortes, Alix is A-L-I-X?
11 A A-L-I-X.
12 Q Okay. And Ledsma is L-E-D-S-M-A?
13 A Yes.
14 Q And is she considered an employee or an
15 independent contractor?
16 A Today, she's an employee.
17 Q Okay. Does that mean before she was not an
18 employee?
19 A Correct.
20 Q When was she an independent contractor?
21 A Last year and prior to that.
22 Q When did she become an employee?
23 A Last year.
24 Q When in last year?
25 A I don't recall.



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1 Q What officially made Ms. Ledsma an
2 independent -- I'm sorry. What officially made
3 Ms. Ledsma an employee?
4 A I don't understand the question.
5 Q You said that Ms. Ledsma is now an employee,
6 but she used to be an independent contractor. What
7 changed?
8 A She was an agent before and she's no longer a
9 producing agent.
10 Q What does she do now?
11 A She's a manager, sales manager.
12 Q When Ms. Ledsma was a producing agent, was she
13 working under a contract with Avant?
14 A Under a contract as an independent contractor.
15 Q Did she actually sign a written contract?
16 A No.
17 Q When Ms. Ledsma became an employee, did she
18 sign a written contract?
19 A As an employee, yes.
20 Q Who is Katrina Guerra?
21 A Katrina Guerra, she also works for us.
22 Q Okay. And just for the record, Katrina is
23 spelled with a K, and Guerra is G-U-E-R-R-A. Ms. Guerra
24 is an employee now?
25 A She is.



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1 Q Did she ever used to be an independent
2 contractor for Avant?
3 A She was an independent contractor.
4 Q As an independent contractor, was she a
5 producing agent?
6 A She was.
7 Q What is her current title now?
8 A She's a sales manager.
9 Q Did Ms. Guerra become a sales manager at the
10 same time as Ms. Ledsma?
11 A I wouldn't know, not sure.
12 Q Who would know?
13 A I would have to check her file and I can
14 answer that later on, yeah.
15 Q When Ms. Guerra was an independent contractor,
16 was she working under a written contract?
17 A No.
18 Q Since becoming an employee -- when she became
19 an employee, a sales manager, did Ms. Guerra sign a
20 written contract?
21 A Yes.
22 Q What do sales managers do at Avant?
23 A They help with the day-to-day sales operation.
24 Q Do the sales managers manage a team of agents?
25 A Yes.



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1 Q How many producing agents does Avant currently
2 have?
3 A I wouldn't know.
4 Q Who would know?
5 A Once I check, I'd be able to answer that later
6 on.
7 Q Is it more than ten?
8 A Say again.
9 Q Does Avant have more than 10 producing agents
10 currently?
11 A Yes.
12 Q More than 20?
13 A Yes.
14 Q More than 30?
15 A That I wouldn't know.
16 Q Okay. Is it fair to say it might be somewhere
17 between 20 and 30?
18 A I don't know.
19 Q All right. What do the sales agents do for
20 Avant Assurance?
21 A What do?
22 Q What do sales agents do for Avant Assurance?
23 A When?
24 Q What's their job? What do sales agents do --
25 the producing agents, what do they do?



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1 A They sell insurance policies.
2 Q Okay. And how does Avant recruit its
3 insurance agents?
4 A Mostly referrals. And we may have posted an
5 ad last year.
6 Q I'm sorry, say that again.
7 A We may have posted an ad last year, yeah.
8 Q Where would that ad have been posted?
9 A I wouldn't recall.
10 Q Who was responsible for posting the ad?
11 A That would be me.
12 Q Would it have been posted on Indeed?
13 A I wish I knew, I don't recall at this time.
14 Q Okay. Do insurance agents have to fill out an
15 employment application before they begin working for
16 Avant?
17 MR. CUETO: Object to the form. You can
18 answer.
19 BY MR. CUMMINGS:
20 Q You can answer.
21 A No, they're not required.
22 Q Has any insurance agent that ever worked for
23 Avant ever filled out an employment application?
24 MR. CUETO: I object to the form. You can
25 answer.



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1 A What's the question again?
2 BY MR. CUMMINGS:
3 Q Yeah, basically, has any insurance agent that
4 works for Avant or has worked for Avant ever fill out an
5 employment application?
6 A No.
7 Q Who runs the hiring process for agents?
8 A I do.
9 Q Do you hire every agent individually,
10 yourself?
11 A No.
12 Q Who helps you with the hiring process?
13 A That would be the sales managers.
14 Q In 2020, when you first opened Avant, who
15 helped you with the hiring process?
16 A I did.
17 Q Did you hire Delio Batista?
18 A I'm not sure about the word hired because that
19 might imply that he was an employee when he was not.
20 Q Okay. So, if you have -- you consider Delio
21 Batista an independent contractor, right?
22 A Correct.
23 Q Okay. Was he working for Avant Assurance?
24 A He was producing.
25 Q And how did he establish his employment

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1 relationship with Avant, did he just show up one day and
2 start working on his own?
3 A He did not work for Avant, so there was no
4 employment relationship in there.
5 Q Okay. So, you're saying that he just showed
6 up to the office one day and just started calling
7 customers?
8 A No, I'm making clarification that he did not
9 work for Avant because you mentioned employment.
10 Q Right. No, I understand. I mean, we
11 understand that the basis of this whole lawsuit is
12 whether or not my client is an independent contractor or
13 not, right.
14 But I think we're going to start getting into
15 some silly conclusions if you're saying that, you know,
16 because you think he's an independent contractor, that
17 what, he hired himself and just started working there.
18 So, what I'm really asking you is, did you
19 know Delio Batista before 2020?
20 A Yes, I did.
21 Q Okay. How did you know Delio Batista before
22 2020?
23 A He's my mother's boyfriend. I don't know if
24 you know that.
25 Q I do now.

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1 A Okay.
2 Q All right. And, at some point -- where was
3 Avant Assurance located in 2020?
4 A In Kendall.
5 Q What was the address then?
6 A The exact address, I don't recall. I can
7 definitely get it and send it to you.
8 Q Okay.
9 A Yeah.
10 Q Did Delio ever appear at the Kendall office?
11 A Appeared, he was there physically?
12 Q Yes.
13 A Yes.
14 Q Okay. And what was he doing there?
15 A I assume that he was selling insurance
16 policies.
17 Q Okay. You never actually saw him selling
18 insurance policies?
19 A If I saw him?
20 Q Well, you said you assume, so --.
21 A Yeah, because I don't know what he was doing
22 at all time. That's what I mean.
23 Q Well, I mean, what business relationship did
24 Avant Assurance have with Delio Batista?
25 A As a producer.

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1 Q Right. So, did you actually see him in the
2 office producing?
3 A Yes.
4 Q All right. Now, before he started producing,
5 how did Delio find out about the job at Avant?
6 A We don't have a job available, so I don't
7 understand your question.
8 Q Okay. Well, Avant Assurance is an insurance
9 agency, right?
10 A Correct.
11 Q And insurance agencies need sales agents to
12 sell insurance to customers, right?
13 A Correct.
14 Q Okay. In 2020, how did Avant Assurance get
15 its insurance agents?
16 A By word of mouth.
17 Q Okay. And so how did Delio find out that
18 Avant Assurance was hiring, or I guess --?
19 A Was looking to get insurance agents?
20 Q -- Insurance agents appear at their office in
21 Kendall?
22 A Because I asked him, I -- he was working at
23 the time.
24 Q Okay.
25 A He said that he wasn't, and he was interested,

1 that we were looking for insurance agents.

2 Q Okay. Was Delio Batista an insurance agent

3 before he started working for Avant?

4 A I don't think so.

5 Q How did Delio Batista learn to do the work he

6 was doing at Avant?

7 A That I wouldn't know. You would have to ask

8 him.

9 Q Okay. Does Avant Assurance have any type of

10 training for its insurance agents?

11 A No. Just general trainings that are available

12 in the industry.

13 Q Let's talk about 2023, let's talk about now.

14 Are any of the producing sales agents for Avant

15 considered employees?

16 A Some are.

17 Q Okay. The -- in short, the producing sales

18 agents that are currently considered employees, do they

19 receive training before they start at Avant?

20 A If they receive training, yes.

21 Q Okay. What kind of training do they receive?

22 A Basic training about the company.

23 Q Who provides the training to the insurance

24 agents that are considered employees?

25 A That would be one of the sales managers.

1 Q Do the sales managers create their own

2 training program, or are they given the training program

3 to teach to the employees?

4 A I think they created the training program.

5 Q Did you create the training program?

6 A I did not.

7 Q Do you know what the training program consists

8 of?

9 A I'm not sure. We haven't had a recent agent

10 joining our team, so I haven't looked at the training

11 program.

12 Q Is the training program written down?

13 A I would assume so, but I don't know.

14 Q Whatever training is provided to employees

15 now, was that training provided to sales agents back in

16 2020?

17 A No.

18 Q If Delio Batista was not an insurance agent

19 before working with Avant Assurance, how did he learn to

20 become a sales agent?

21 A I guess he took a course, but that's a

22 question you would need to ask him.

23 Q All right. So, please walk me through the

24 process if you have -- let's go back to 2020, the

25 insurance -- producing sales agent comes into the office

1 in Kendall, what do they do to start their day?

2 A I guess they will need to turn on their

3 devices in order to start getting calls.

4 Q What types of devices are you referring to?

5 A A computer.

6 Q What kind of computer did the sales agents use

7 back in 2020?

8 A So, we had desktop computers that were

9 available at the office, and some agents brought their

10 own laptops, so they could use either one or the other.

11 Q Now whether the agents brought their own

12 laptops or they were using a computer that was already

13 provided by Avant, was there a certain type of software

14 that the agents had to use?

15 A So, we have just like Uber, Uber manages a

16 platform. We have a platform for the leads.

17 Q What's the name of the platform?

18 A It's called Radius BOB.

19 Q R-A-D-I-U-S B-O-B?

20 A Yes, it's a CRM, yes.

21 Q All right. And is Radius BOB, is that a

22 program that is licensed from that company?

23 A Licensed meaning?

24 Q Yeah. Do you have to lease that software or

25 do you just pay for it once?

1 A No, we pay monthly.

2 Q Who pays for the software?

3 A Our company.

4 Q Do the agents have to pay any portion of the

5 fee for the monthly license for Radius?

6 A No.

7 Q Does Avant Assurance still use Radius BOB as

8 the software platform for leads?

9 A Yes.

10 Q What other software do agents use to do their

11 jobs?

12 A Before or now?

13 Q Let's go back to 2020, what other software did

14 agents have to use besides Radius?

15 A I mean, that I recall that was the only one.

16 They probably had a spreadsheet where they were keeping

17 track of sales.

18 Q Did Avant require agents to keep a spreadsheet

19 of their sales?

20 A No, that was for their benefit. If they

21 decided to keep track of their sales, they could use a

22 spreadsheet.

23 Q Okay. If the agents did not keep track of

24 this sales on a spreadsheet, did Avant have an

25 independent way of knowing how much the agents were

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1 selling?
2 A Yes. The CRM, the tool that they were using.
3 Q Radius?
4 A Correct.
5 Q What part of Radius allows Avant to track the
6 sales?
7 A I don't understand that question.
8 Q Who can track sales on Radius? Let me put it
9 like that.
10 A Who can track sales?
11 Q Yeah. Does every user have the ability to
12 track the sales on Radius, or does only like one account
13 manager have the ability to track the sales?
14 A So, both, the -- each agent could track his
15 own sales and the account manager could also track the
16 agent sales.
17 Q Who was the account manager in 2020?
18 A That would be me.
19 Q Okay. And then does Radius actually give the
20 leads or do the leads come from another source?
21 A Radius does not provide leads.
22 Q How do the agents know which customers to
23 call?
24 A They don't call, the phone rings and they're
25 free to either answer the phone or not answer the phone.



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1 Q Okay. So, you mentioned in 2020 that
2 producing agents had certain devices, one was a
3 computer, they also have a phone?
4 A No, the -- the -- the CRM was integrated with
5 a phone system, it's the same platform, just like Uber.
6 You could place a call using an Uber platform. Yeah.
7 Q Did insurance agents have headsets that they
8 used?
9 A Some bought their own headsets and brought
10 them to the office. One good example was Delio. He had
11 some huge headsets and I guess he preferred those and he
12 bought his own. Some of the agents, they had their own
13 headsets as well.
14 Q Okay.
15 A We have headsets available, but they were free
16 to use their own basic equipment. Even their mouse,
17 some of them bought their own mice and brought them
18 for their convenience.
19 Q Okay.
20 A And keypads and everything. So, they were
21 free to bring their equipment.
22 Q Got it. Now you mentioned that the phone
23 would ring and when the phone rang, who was on the other
24 end of the call?
25 A I don't understand the question.



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1 Q Yeah, so like, let's just give you an example.
2 So, I'm insurance agent working at -- or I'm a sales
3 agent working at Avant, and I sit down at the computer
4 and then the phone rings, so when the phone rings, who's
5 on the other end of the phone?
6 A It could either be a prospect or a company --
7 a third party company that we may be using for
8 generating leads.
9 Q When you say a prospect, you mean a customer
10 who needs insurance him or herself?
11 A Yeah, but at that point it would be a prospect
12 because it's still not a customer.
13 Q Got you. All right. So, somebody looking for
14 insurance basically?
15 A Exactly.
16 Q Okay. So sometimes, potential customers just
17 call into Avant on their own?
18 A Correct. And the agents also were, in some
19 cases, they were brokering calls to people that they
20 knew.
21 Q All right. Now, you mentioned that there was
22 a third party company that generated leads. What
23 company was that?
24 A There's multiple lead vendors basically and
25 we're probably not working with them today.



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1 Q Okay. In 2020, what lead vendor did Avant
2 work with?
3 A It was a call center that was providing
4 basically phone calls.
5 Q Where was that call center located?
6 A Where was?
7 Q Where was the call center located?
8 A I wouldn't know the answer to that because I
9 would guess they would have an office setting or -- and
10 some of them maybe working remote because it wasn't just
11 one vendor, it was multiple vendors. So, I don't know
12 where each vendor was located.
13 Q Did Avant work with any lead vendors in
14 Columbia?
15 A Lead vendors in Columbia, yes.
16 Q What was the name of that lead vendor?
17 A It's called Avant Assurance SAS.
18 Q Who owns Avant Assurances SAS?
19 A I do.
20 Q Are you from Columbia?
21 A I am not.
22 Q Who's the CEO of Avant Assurance SAS?
23 A So, in Columbia, the CEO figure doesn't exist?
24 Q Okay. What would be the equivalent of a CEO
25 in Columbia?



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1 A It's a Spanish term called representante legal
2 (phonetic).
3 Q And who is the representante legal?
4 A I am.
5 Q Have you ever been to Columbia?
6 A Yes, I have.
7 Q Did you have to go to Columbia to establish
8 Avant Assurance SAS?
9 A Yes.
10 Q What year did you do that?
11 A I don't recall.
12 Q How many employees do you have in Columbia
13 that work for Avant Assurance SAS?
14 A I don't know.
15 Q You mentioned that you do not recall when you
16 had to go to Columbia to establish Avant Assurance, was
17 it before 2020?
18 A I know it was in the middle of the pandemic,
19 but I wouldn't be able to answer that right now.
20 Q All right. And how does Avant Assurance SAS
21 find customer leads?
22 A I'm not sure because that is proprietary
23 information for a third party that is not part of this
24 case that is not commonly known to the public.
25 Q All right. So, it's not that you're not sure,



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1 you're just saying that you don't want to explain that
2 information right now because that's proprietary, trade
3 secret?
4 A Correct.
5 Q Okay. Understood. All right. But either
6 way, there are people in Columbia who call over to
7 offices in Kendall or Doral and say, "Here are potential
8 customers to sell insurance to," correct?
9 A What's the question again?
10 Q There are people in Columbia working for Avant
11 Assurance SAS who call producing agents in Doral, or
12 Kendall at the time, to provide leads for potential
13 customers who need insurance?
14 A Correct.
15 Q Does Avant Assurance SAS have a book of
16 business?
17 A No.
18 Q Are all of the -- does Avant Assurance only
19 sell insurance to customers in the United States?
20 A Can you please repeat the question?
21 Q Right. Is Avant Assurance only selling
22 insurance in -- to people in the United States?
23 A Yes.
24 Q All right. The other lead vendors that you
25 refer to that are not Avant -- I'm sorry, let me



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1 rephrase this question. Do you know the name of any
2 other lead vendor that is not Avant Assurance SAS?
3 A Yes. There's many.
4 Q How many lead vendors approximately does Avant
5 work with?
6 A Probably five, four, three, I don't know the
7 exact number.
8 Q Okay. Do you own any of the other lead
9 vendors?
10 A No.
11 Q Which lead vendor provides the majority of
12 leads to Avant?
13 A To whom?
14 Q Which lead vendor provides the majority of
15 leads to Avant Assurance?
16 A It could vary.
17 Q Vary by what?
18 A Depending on the day. So, I wouldn't know
19 exactly how to answer that.
20 Q If you were to -- have you been using the same
21 three, four, or five lead vendors since 2020?
22 A Yeah.
23 Q If you were to pull the data from 2020 to now,
24 which lead vendor would you expect to have provided the
25 most leads to Avant Assurance?



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1 A Which lead vendors -- what's the question
2 again?
3 Q Yeah. If you pulled data for the last three
4 years from 2020 to 2023, basically now, which lead
5 vendor would you expect to have provided the most leads
6 to Avant Assurance?
7 A That would probably be the SAS company.
8 Q Once a sales agent gets a lead from whatever
9 lead vendor they get it from, what is the next step in
10 the process that the sales agent has to make?
11 A Well, each agent will probably have their own
12 process. They're not required to follow a specific
13 path, I would say, it's based on their own skillsets.
14 Q All right. But is it pretty fair to say that
15 generally speaking, the insurance agent, once they get a
16 lead, they follow up on the lead by contacting the
17 potential customer?
18 A They follow up on the lead -- I'm not sure
19 what are you asking.
20 Q Yeah, I mean, once they get the phone number
21 for a customer, a potential customer, is it fair to say
22 that they generally call that potential customer?
23 A They get a phone call from the potential
24 customer, so they don't need to call the potential
25 customer.



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1 Q Okay. So when -- what does the Avant
2 Assurance SAS do then? What does the lead vendor do?
3 A They transfer a potential customer like any
4 lead vendors.
5 Q I see. Okay. I understand. So, how does the
6 potential customer get in touch with the lead vendor?
7 A I'm not sure what you're asking.
8 Q Yeah, I mean, how would a potential customer
9 know to call Avant Assurance SAS?
10 A It could be through advertising.
11 Q Does Avant Assurance SAS or any other lead
12 vendor reach out to the potential customers?
13 A Probably yes.
14 Q So, it could be either way?
15 A Either way, yeah. Same as the agents
16 themselves, they could reach out to potential customers
17 on their own.
18 Q Okay. So, if an insurer -- a producing agent is
19 in the office at Avant, when a call comes through Radius
20 CRM there's already a potential customer on the line to
21 speak with?
22 A Was that a question?
23 Q Yeah, that's what -- yeah, that's what I'm
24 asking. Let me rephrase the question. When a producing
25 agent is in the office, when they receive a call through



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1 the Radius CRM, there's already a potential customer on
2 the line?
3 A If they are using the Radius CRM whether
4 they're in the office or not and the phone rings, they
5 could be a potential customer.
6 Q Which means that when the call comes through
7 to the insurance agent, they're automatically speaking
8 to a potential customer?
9 A Correct.
10 Q Okay. And at that point when the sales agent
11 is on the phone with the potential customer, then the
12 sales agent just does their job and tries to sell
13 insurance, correct?
14 A Yes.
15 Q Okay. Once, let's say that the sales agent
16 has a successful call and the potential customer wants
17 the insurance, now what process has to be followed by
18 the sales agent to complete that sale?
19 A What process -- what's the question?
20 Q Yeah, so sales agent gets the call that comes
21 through from the lead vendor, they sell the customer.
22 So, now the customer wants some type of insurance,
23 whether it be Ambetter, Oscar, United Healthcare,
24 whatever insurance they want, what is the next step in
25 the process to complete the sale to make sure that the



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1 customer gets the insurance?
2 A So, they will need to enter the insurance
3 company's information selected by the prospect.
4 Q I'm sorry, could you say that again?
5 A So, they would need to write down the
6 insurance company selected by the prospect.
7 Q That's what the sales agent does?
8 A Correct.
9 Q Okay. Where do they write down the insurance
10 company?
11 A In the platform.
12 Q In Radius?
13 A Correct. That's like the -- just to give you
14 an example, that's like the Uber driver completing
15 their -- their ride, you know, they had to log in and
16 enter that it was completed on their platform.
17 Q Got it. And once the agent writes down the
18 insurance company on Radius, whatever the insurance
19 company is, let's say it's United Healthcare, what then
20 happens? Does any paperwork have to be signed by the
21 customer or the agent?
22 A Paperwork, no. We basically don't have papers.
23 Q Is that because everything is digital?
24 A Everything is digital, yeah.
25 Q All right. So, let's just assume there's a



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1 digital process, so in the digital process, what happens
2 next after the -- a sales agent writes down the
3 insurance company in Radius?
4 A I'm not sure. What was the question?
5 Q Well, I mean, how does the customer get the
6 insurance?
7 A Oh, that's with the insurance company, they
8 issue a policy.
9 Q Right. So, how do they --?
10 A The insurance company sends a letter right by
11 regular mail to the new customer with the confirmation
12 that they have been enrolled.
13 Q Got it. So, once the sales agent writes down
14 the insurance company in Radius, there's automatic
15 process that just contacts the insurance company?
16 A I still don't understand your question.
17 Q Okay. So, I'm a sales agent, I'm on the phone
18 with a potential customer, customer says, "I want United
19 Healthcare".
20 Okay. But we know that they don't just
21 automatically get United Healthcare. I'm assuming that
22 the person who wants the insurance has to sign some type
23 of a document. Is that correct?
24 A They're not required to sign documents.
25 Q They're not. Okay. So, is the insurance



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1 agent required to sign any document?
2 A Required, no.
3 Q So, people are just getting insurance without
4 signing any type of contract with Avant Assurance?
5 A They don't need to sign a contract with Avant
6 Assurance, the conversation happened between the
7 prospect and the agent.
8 And so, the prospect wouldn't need to actually
9 sign anything to get insured.
10 Q Okay. And so, now Radius is just keeping
11 track that the producing agent made a sale?
12 A Yeah. It stays in there -- in Radius.
13 Q Okay. And what does the insurance agent have
14 to do to tell Radius that they completed a sale?
15 A Nothing, because once they pick up the phone,
16 they have been assigned to work with the prospect. So,
17 their name is attached to the prospect's name.
18 Q But sometimes when the agent gets off the
19 phone with a potential customer, the customer does not
20 want the insurance or they don't sell the customer,
21 right?
22 A Correct. Yeah, you don't get to sell all of
23 them.
24 Q Right. So, what's the difference between the
25 two? What is happening different in Radius to let



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1 Radius know that a sale was made?
2 A Like I said before, the agent will need to
3 enter the insurance company's information that the
4 prospect agreed to get.
5 Q Okay. And then after the agent enters the
6 insurance company's information, Avant Assurance has no
7 more -- there's no other paperwork that Avant Assurance
8 has to fill out, and when I say paperwork, I don't mean
9 physical papers, I just mean there's no more documents
10 that have to be filled out at all on Avant Assurance's
11 side before this customer gets the insurance?
12 A I'm not sure what you're asking.
13 Q Okay. Let's just go through this step by
14 step. I sell, the customer agrees that they want United
15 Healthcare, correct?
16 A Um-hum.
17 Q As the insurance -- you have to say yes or no.
18 A Yes.
19 Q Okay. As the insurance agent, I now go on the
20 Radius and say, "Okay, this customer wants United
21 Healthcare," right, so I click a button and that happens
22 in the software?
23 A Yeah. They basically enter the name of the
24 insurance company.
25 Q Okay. And then that's it, like there's no



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1 more calls with this customer anymore from Avant?
2 A For -- on the agent side, no, there's no other
3 interaction needed.
4 Q No other interaction with the customer?
5 A Yeah, the agent doesn't need to further
6 interact with the customer.
7 Q Does anybody else at Avant Assurance interact
8 with the customer any further after the agent completes
9 the sale?
10 A Yes, we have a customer service team.
11 Q After the agent writes down the insurance
12 company that the customer wants to use, what does Radius
13 do to inform the insurance company?
14 A Nothing.
15 Q How does the insurance company find out that
16 they have a new customer?
17 A That's done by our customer service.
18 Q Got it. Okay. So, the customer service team
19 then takes over, and what do they do?
20 A They basically do data entry.
21 Q Okay. What data do they enter?
22 A The customer's information into the insurance
23 company's portal, maybe, yeah.
24 Q And who's on -- who was on the customer
25 service team in 2020?



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1 A Well that, I don't know.
2 Q Why not?
3 A Because it was probably more than one person,
4 and I don't recall. I don't remember.
5 Q Okay. Were you ever part of the customer
6 service team?
7 A Yes, I have been part of the -- their team.
8 Q Okay. Did you ever do data entry and send
9 customer information over to insurance companies?
10 A Yes.
11 Q Did you do that in 2020?
12 A Yes.
13 Q And were you the only person doing it in 2020?
14 A No, I probably had more people assisting me.
15 Q Okay. But you don't remember any of those
16 people?
17 A It was 2020 no, I don't remember.
18 Q Okay. How about on -- your wife, did she ever
19 do any customer service data entry?
20 A Data entry, probably she did.
21 Q Do you still do data entry?
22 A What's the question?
23 Q Do you still do data entry now?
24 A Yes.
25 Q Does Ms. Quintero still do data entry now?



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1 A That I don't know.
2 Q Why not?
3 A Because I'm not controlling a 100% of what she
4 does every single day.
5 Q What does she do for Avant Assurance?
6 A She works with the mostly with the independent
7 agents -- with the relationship with the independent
8 agents.
9 Q What does that mean -- what does her day, like
10 when she comes into the office in Doral what does she do
11 when she gets there?
12 A She may be getting call from independent
13 agents inquiring about if any company is doing the
14 market or if anything has changed when it comes to
15 products if there's any news on the industry and
16 basically keeping you know, the relationship. Sometimes
17 there's nothing going on.
18 Q All right. What is Blueink?
19 A What is?
20 Q Yes, what is Blueink?
21 A Blueink, they're like a DocuSign, it's a
22 platform -- platform.
23 Q Okay. And does Avant Assurance use Blueink?
24 A If we're currently using, or if we have used
25 it in the past?



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1 Q Let's do both. Did you use Blueink -- did
2 Avant Assurance use Blueink in the past?
3 A In the past, yes.
4 Q When did Avant Assurance start using Blueink?
5 A That I don't recall.
6 Q When did Avant Assurance stop using Blueink?
7 A Last year.
8 Q Why did you stopped using Blueink?
9 A Why?
10 Q Yes.
11 A Too expensive and it's not required, so.
12 Q Got it. You said it's a DocuSign platform.
13 What types of documents were being signed using Blueink?
14 A What type of document?
15 Q Right.
16 A That we were using or in general?
17 Q I mean, I'm more interested in what Avant
18 Assurance -- what types of documents Avant Assurance was
19 having signed using Blueink?
20 A So, we had a general consent form.
21 Q And who was signing the general consent form?
22 A Who was signing -- the prospects, but not at
23 all times.
24 Q What was the general consent form basically
25 for?



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1 A Just to basically protect the company from
2 consumer, going back and saying that they did not
3 authorize the enrollment.
4 Q So, would that -- was that DocuSign -- was
5 that document in English or Spanish, the general consent
6 form?
7 A Probably both.
8 Q Who created the general consent form?
9 A I did.
10 Q Did you have help in creating that general
11 consent form from an attorney?
12 A No.
13 Q Did you require that all potential clients
14 sign that general consent form after they were sold?
15 A No.
16 Q Who was responsible -- for if a customer did
17 sign that general consent form, who was responsible for
18 giving it to them?
19 A What's the question again?
20 Q If a customer did sign the general consent
21 form, who was responsible for giving it to them?
22 A That would have been the either the agent or a
23 customer service representative.
24 Q Okay. And so, what would decide whether or
25 not a customer received the general consent form?



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1 A Can you please repeat that question?
2 Q Yeah, if they weren't always used -- but my
3 understanding of what you said was that Avant wanted to
4 use the general consent forms to protect itself because
5 you know, a customer might get insurance and say, well,
6 I didn't sign up for it.
7 So, this general consent form basically, I'm
8 assuming, said that the customer, did sign up for the
9 insurance and that they wanted it, correct?
10 A I definitely did not understand what you're
11 asking.
12 Q Okay. Well, you drafted the general consent
13 form, right?
14 A Yes.
15 Q Okay. What was the purpose of the general
16 consent form?
17 A In order to protect the company from any
18 consumer that might come back and say that they did not
19 authorize enrollment.
20 Q Okay. So why would you not have every
21 customer sign a general consent form, if you want to
22 protect Avant Assurance in that way?
23 A Because the calls were also recorded.
24 Q Got it.
25 A So, it wasn't a required document and industry



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1 standard (phonetic) also it doesn't require to have a
2 consent form.

3 Q And so, then we get back to my other question
4 which was, when was a decision made to sometimes use
5 general consent -- well, let me ask a different
6 question. Who made the decision to use the general
7 consent forms on a case-by-case basis?

8 A The agent.

9 Q Okay. So, sometimes an agent would choose to
10 use it and sometimes they wouldn't?

11 A Correct.

12 Q Okay.

13 A They were making the decision based on their
14 own criteria with the prospect.

15 Q All right. Was the general consent form
16 actually titled general consent form, is that what's at
17 the top of the document?

18 A I don't know what it would say.

19 Q Did it say client consent statement?

20 A I'm not sure.

21 Q Okay. Is -- do you have access to any of
22 those forms that you were, that you called the general
23 consent form?

24 A If I have access?

25 Q Yes.

1 A Yes.

2 Q Okay. And so, you can go somewhere and look
3 to see what the name of that document is?

4 A Correct.

5 Q All right. Besides what you call the general
6 consent form, did -- was Blueink used for any other
7 documents to be signed?

8 A It could have been.

9 Q Okay. Which other documents?

10 A That I wouldn't know because I mean you could
11 basically upload a template and use it for people to
12 sign.

13 Q Got it. Okay. Now once an insurance agent
14 registers a sale through Radius, do they receive
15 compensation for each sale that they make?

16 A Can you please repeat that question?

17 Q Yes. Do insurance agents receive compensation
18 for each sale that they make?

19 A Yes, if the sale was paid by the insurance
20 company to Avant the answer is yes. It was on a
21 contingent basis.

22 Q Okay. Now you said if the sale was paid by
23 the insurance company to Avant, what other way was
24 payment made if it wasn't by the insurance company to
25 Avant?

1 A No, so if it wasn't paid to Avant basically
2 means that there was no sale.

3 Q I see, I got it.

4 A Yeah, so there was no compensation due.

5 Q Okay. So, were there situations -- did the
6 situation ever occur where agent is on the phone with a
7 potential customer, they write an insurance company
8 named down in Radius, but then the customer does not
9 actually receive the insurance?

10 A Or it could be that another agent sold the
11 same policy to the same prospect right after the same
12 agent and that's the agent who got compensated. It
13 happens a lot.

14 Q How does that happen?

15 A It happens a lot because the prophet says yes
16 to many agents. So, I could be talking to you today you
17 agree to acquire a policy and then we hang up and
18 tomorrow you get a phone call and then you enrolled
19 again because you forgot that you spoke to me today.

20 And then the second agent is the one that's
21 going to get paid and the second agent might be from a
22 different agency that we don't know of.

23 Q Okay. Has that ever happened internally
24 within Avant where a second agent sells a customer that
25 a first agent had already tried to sell previously?

1 A Yeah, it probably happened amongst your own,
2 your clients as well.

3 Q You mean my clients as an attorney? As a
4 lawyer?

5 A Yeah, the Plaintiffs'.

6 Q You mean -- okay, I see what you mean -- the
7 Plaintiffs'.

8 A Yeah.

9 Q I understand. I got you.

10 A Yeah.

11 Q Okay. All right. Is there any type of a
12 procedure in place at Avant to prevent that from
13 happening?

14 A No.

15 Q Is that just like part of doing the insurance
16 agent business?

17 A Yeah, unfortunately you cannot prevent from a
18 consumer enrolling over and over, because that's the
19 enrollment -- the consumer decision. It's on each
20 agent's job to reinforce to each of the consumer that
21 they have been enrolled. And some agents may do a
22 better job than others, you know.

23 Q Okay. Understood. Were there ever any
24 disputes or arguments or complaints at Avant about
25 agents taking other agents' sales?

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1 A Dispute, no I don't think so. Conversations
2 that, that happen, yes.
3 Q Do you know if there were any of those types
4 of conversations happening between the Plaintiffs in
5 this case?
6 A They could have been involved, but I wouldn't
7 recall exactly.
8 Q Okay. Are you also a sales agent?
9 A I am.
10 Q Okay. And did you also sell insurance
11 policies to potential customers?
12 A Occasionally.
13 Q Did any of my clients, the Plaintiffs' in this
14 case complain to you or have any conversations with you
15 about taking any of their customers?
16 A Never.
17 Q Do you know if any of the Plaintiffs' in this
18 case complained that Andrea Quintero took any of their
19 customers?
20 A No.
21 Q I'm sorry, I didn't hear you.
22 A No.
23 Q Okay. All right. Did Avant have a written
24 contract with its agents about how they would be
25 compensated for making a sale?



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1 A Which type of agents?
2 Q I guess what type of agents do you have?
3 A We have employees and we have independent
4 contractors.
5 Q Okay. So, let's just talk about the
6 Plaintiffs' in this case. So, I'm going to be referring
7 to Delio Batista, Rafaela Valiente, Carlos Lopez and
8 Mariana Lopez.
9 So, did they have a written contract with
10 Avant Assurance that explained how they would get paid
11 for making a sale?
12 A Yes, there was 2 pages document I believe or
13 maybe 3 pages.
14 Q When did they first sign that contract?
15 A I'm not sure that they signed it.
16 Q Okay. What was it a contract or was it just
17 like a inf -- piece of information that was given to
18 them?
19 A It was a contract.
20 Q Okay. Let me show you what I'm going to mark
21 as Exhibit A.
22 Okay. I'm now showing you what I'm marking as
23 Exhibit A for the deposition record.
24 (Thereupon, Plaintiffs' Exhibit A was entered
25 into the record.)



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1 A There's a document there, yes.
2 BY MR. CUMMINGS:
3 Q Okay. You can see the document?
4 A Yes.
5 Q All right. At the top of this document, it
6 says, "Independent contractor non-disclosure agreement
7 between Avant Assurance and Independent Contractor". So,
8 is this the document that you were referring to just a
9 second ago?
10 A So, this is a document that was presented to
11 Mariana Lopez and she did not sign and the one that I
12 was referring to was a different document.
13 Q Okay. Do you remember what the name of that
14 document was that you were referring to, the one that
15 explains the compensation?
16 A No, I don't recall the name. And I believe
17 you have it because you posted in your complaint,
18 partially.
19 Q Okay. Let me check to see now while we're
20 still on Exhibit A here, the one that's on your screen,
21 you said that this agreement was presented to Mariana
22 Lopez, just her in particular or all of the Plaintiffs'?
23 A So, at the time that we had this document
24 prepared, she was the only one that was actively
25 producing for Avant.



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1 Q When was this document prepared?
2 A Sometime in last year.
3 Q And you're saying -- you said that Ms. Lopez
4 never signed this document I'm showing you on Exhibit A?
5 A That I'm aware of she did not.
6 Q Was there any disagreement between you and her
7 about her signing it or she just didn't sign it for some
8 other reason?
9 A She just didn't sign it and basically sent an
10 e-mail saying that she did not longer want to continue
11 producing for Avant.
12 Q Okay. So, Ms. Lopez was sent this Exhibit A,
13 this independent contractor agreement, and in response
14 to receiving it she said, I don't want to work for Avant
15 anymore, or it was just the timing of it, she happened
16 to say she didn't want to work anymore, but the two are
17 not related?
18 A This was probably sent on a Friday, and then
19 on a Monday we received her response.
20 Q Okay. Were you res -- were you surprised when
21 you received her response that she no longer wanted to
22 work for Avant?
23 A Yes, we were all surprised.
24 Q And at the time that Ms. Lopez informed you
25 that she no longer wanted to work for Avant was Delio



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1 Batista working for Avant at that time?

2 A No.

3 Q Was Carlos Lopez working for Avant at that

4 time?

5 A No.

6 Q Was Rafaela Valiente working for Avant at that

7 time?

8 A That I don't recall.

9 Q Okay. And -- okay, no problem. Let me show

10 you -- okay. I'm now going to show you Exhibit B for the

11 record.

12 (Thereupon, Plaintiffs' Exhibit B was entered

13 into the record.)

14 BY MR. CUMMINGS:

15 Q Okay. I'm now showing you Exhibit B -- not

16 sure -- let me to just make this a little bigger. All

17 right. Okay. Can you see the document that I'm showing

18 you on the screen now that I'm marked as Exhibit B?

19 A Appears to be an e-mail, right?

20 Q Yeah. I'm just asking can you see it, can you

21 read it because I don't know if I need to make it

22 bigger.

23 A No, I cannot read what it says.

24 Q Okay. Let me try to make it a little bigger.

25 Can you -- okay, can you -- is it more legible now? Can

1 you read it now?

2 A Yes.

3 Q Okay. All right. Do you recognize this e-mail?

4 A Yes.

5 Q All right. And this e-mail was sent from

6 Jennifer Manjarres correct?

7 A Correct.

8 Q And her e-mail address is there, and it says

9 jmanjarres@avantassurance.com?

10 A Yes.

11 Q Okay. Is that still her e-mail address?

12 A That's still her e-mail, yeah.

13 Q Got it. All right. And when I move over to

14 the date, it says July 8th, 2022 at 5:26 p.m. and it

15 says that this e-mail was sent to somebody named Ana,

16 alejandragutierrez_369, me which I'm assuming is

17 Jennifer Manjarres, Katrina, mdmc0130, Alix, Reinier,

18 Andrea and that's all we can see. So let me just start

19 with the first person. Do you know who Ana is?

20 A We have a person called Ana, but I don't know

21 if that's the same Ana.

22 Q Okay. What's the Ana that you know -- what's

23 he name?

24 A She's Monge.

25 Q Could you please spell that?

1 A Well, don't quote me on the spelling.

2 Q Uh-hum.

3 A Yeah, M-O-N-G-E.

4 Q Does that Ana still work for Avant now?

5 A She's still a -- she's an employee.

6 Q What does Ana do?

7 A She's a sales agent.

8 Q Okay. And then who's alejandrogutierrez_369?

9 A I don't know who that e-mail belongs to.

10 Q Do you know who the Katrina name belongs to?

11 A No.

12 Q Okay. Could that be Katrina Guerra?

13 A I don't know. I mean, if you cannot see the

14 whole e-mail I don't want to guess right.

15 Q Good answer. All right. Do you know who

16 mdmc0130 is?

17 A No.

18 Q Okay. How about Alix?

19 A If I don't see the full e-mail, I cannot

20 answer.

21 Q Okay. What about Reinier?

22 A The same, if I don't see the full e-mail, I

23 wouldn't know if that's me or not.

24 Q All right. And then Andrea, you can't say

25 whether or not that's your wife? Mr. Cortes you can't

1 say whether or not the Andrea name is your wife?

2 MR. CUETO: I'm sorry. The --

3 A Yeah.

4 BY MR. CUMMINGS:

5 Q Okay. But either way let's just look at the

6 substance of this e-mail. It says, "Hello ladies,

7 please review the attached two documents and sign where

8 indicated by next week, Tuesday July 12th. If you have

9 any questions, please feel free to let Reinier know".

10 So, at the bottom we see that there's two

11 documents that are attached. One says, "Avant

12 Assurance, independent Contractor Standards Guide" and

13 then one says "NDA independent and then . . ."

14 So, let's just look at the first document, the

15 Avant Assurance Independent Contractor Standards Guide

16 was that document just newly created back in July, 2022?

17 A That was a document created last year.

18 Q Okay. Who created that document?

19 A I'm not sure if it was in July or not.

20 Q Do you know who created it?

21 A We probably have a legal assistant creating a

22 document.

23 Q A legal assistant that works for of Avant or

24 legal assistant that Avant --?

25 A Yes, contractor --.

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1 Q Contractor?

2 A Contractor, yeah.

3 Q Okay. Now when you say probably, because you

4 tend to say probably --.

5 A We may have edited document, we may have

6 edited document and after the fact.

7 Q Okay. So, just to remind you, please let me

8 finish because we're going to drive the Court Reporter

9 crazy because we're talking over each other. So, let me

10 just re-ask that question.

11 Did Avant Assurance hire ind -- outside legal

12 counsel to create an independent contractor guide for

13 them?

14 A Yes.

15 Q Okay. Was that Mr. Cueto?

16 A What was the question?

17 Q Was it Mr. Cueto -- was it Santiago Cueto was

18 the person that you hired for legal?

19 A It was his Law Firm.

20 Q Okay. All right. And then the other

21 document, the NDA independent contractor agreement,

22 which I already showed in Exhibit A.

23 Did Mr. Cueto's Law Firm help Avant Assurance

24 prepare that document as well?

25 A I don't remember. And I can barely read what



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1 you have on the screen, by the way.

2 Q Which part are you talking about?

3 A The attachments, I can barely see what they

4 say.

5 Q Okay. Just bear with me for a second. You

6 know what, we've been going for about hour and a half

7 this is a good time to take a break. Let's take a 10

8 minute break?

9 MR. CUETO: Okay.

10 MR. CUMMINGS: We come back at 11:45?

11 MR. CUETO: Yeah.

12 MR. CUMMINGS: Okay.

13 THE COURT REPORTER: Off the record.

14 (Thereupon, a short discussion was held off

15 record.)

16 (Deposition resumed.)

17 BY MR. CUMMINGS:

18 Q Okay. All right. So, before we took a break,

19 Mr. Cortes I was showing you this document. Okay. I was

20 showing you this document and this is Exhibit B and I

21 just want to point the -- to the bate stamp number at

22 the bottom.

23 So, this says Defendant's Mariana Lopez and

24 Carlos Lopez bate stamp number 2, which we provided in

25 the other state court case where Avant Assurance is



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1 suing two of my clients.

2 So, I'll just put that to the side for now.

3 And what I'll do now is I'll show you Exhibit C.

4 (Thereupon, Plaintiffs' Exhibit C was entered

5 into the record.)

6 BY MR. CUMMINGS:

7 Q And Exhibit C has a different bate stamp

8 number at the bottom, which is Avant Assurance versus

9 Lopez, which is this present case. And it has bate

10 stamp number 24.

11 So, this document was provided by your

12 attorney or you know, by the defendants in this case,

13 which is Avant. Anyway, all that to say here we can see

14 essentially the same e-mail, but it's a little bit of a

15 cleaner copy and good for us, it actually has the CC

16 names up here also.

17 So, what I'll do is I'll just make this a

18 little bigger for you and let's just start with those

19 other e-mail addresses that we were referring to

20 earlier.

21 Okay. So, you previously said that Ana could

22 be Ana, you know, Monge M-O-N-G-E and it is in fact her.

23 Okay. So, again who is she at Avant Assurance, she's a

24 sales agent?

25 A She's a sales agent.



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1 Q Okay. Got it. Moving over to Mariana Lopez,

2 we see that that e-mail address says

3 mariana62@gmail.com. Do you recognize that e-mail

4 address?

5 A Yeah, it could be her e-mail.

6 Q Okay. All right. And then -- and by her you

7 mean Mariana Lopez, you're a former sales agent, right?

8 A Correct.

9 Q Okay. Katrina is in fact Katrina Guerra and

10 Ms. Guerra is the person who you said is now a sales

11 manager at Avant?

12 A She's a sales manager now, yes.

13 Q Got it. The mdmc0130@gmail.com that still

14 doesn't ring a bell to you?

15 A No.

16 Q All right. The Alix name was Alix Ledma. Do

17 you recognize that e-mail address after the name?

18 A Yes.

19 Q Okay. And then Reinier, that seems to be you,

20 Reinier Cortes, do you recognize your e-mail address?

21 A That's my e-mail.

22 Q Okay. And then Andrea says, Andrea Gonzalez.

23 Do you recognize that e-mail address?

24 A Yes.

25 Q Okay. Is that the e-mail address for your



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1 wife?
2 A For Andrea Gonzalez.
3 Q Okay. Is she the same Andrea Gonzalez
4 Quintero?
5 A Yes.
6 Q Okay. Who is your wife, right?
7 A She is also my wife.
8 Q Okay. All right, cool. So now we know who
9 those people are. And then previously you said that you
10 couldn't see the attachments. Are the attachments more
11 visible in Exhibit C?
12 A There's a title, but the attachment itself, I
13 don't know what it says.
14 Q Well, yeah, of course. Like I'm not asking --
15 we can just see that there's two attachments here that
16 are PDFs.
17 A Correct.
18 Q And you can actually read what the PDF title
19 says here though, right?
20 A Yes.
21 Q Okay. Got it. All right. So, were these -- the
22 independent contractor standards and the independent
23 contractor agreement itself, did they exist prior to
24 July, 2022?
25 A I'm not sure when they were prepared.



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1 Q Did you direct Ms. Manjarres to send an
2 independent contractor agreement and independent
3 contractor standard out to sales agents that were
4 currently working at Avant at that time?
5 A Can you repeat the question?
6 Q Yeah. Did you tell Ms. Manjarres to send the
7 independent contractor agreement and the independent
8 contractor standards to all of the sales agents that
9 were working at Avant at that time?
10 A Not to all, but to some agents, yes.
11 Q Okay. Why just to some and not to all?
12 A Because there's agents that were not
13 soliciting business from the office.
14 Q Okay. Were they work -- were those sales
15 agents who were not soliciting business from the office
16 were they physically present at Avant's office?
17 A They were on and off.
18 Q Did you consider the agents that were on and
19 off to be independent contractors?
20 A Yes, they're also independent contractors.
21 Q Okay. Did those agents that you're referring
22 to sign an independent contractor agreement before this
23 one was sent out in July 8th, 2022?
24 A Not that I recall.
25 Q All right. And you -- I believe you



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1 previously mentioned that Delio Batista never signed an
2 independent contractor agreement with Avant, correct?
3 A I'm not sure he signed or not but most likely
4 he didn't.
5 Q Why is that most likely?
6 A Because I don't know why he signed or not.
7 Q Okay. Why don't you know?
8 A Because I don't know Toussaint. I don't know
9 every single document that people have signed with us.
10 Q Okay.
11 A I may not recall.
12 MR. CUETO: Asked and answered.
13 BY MR. CUMMINGS:
14 Q No, I got it. Why did you feel it was
15 important for certain sales agents to sign an
16 independent contractor agreement in July, of 2022?
17 A Well, the company continued to grow, it was
18 important to have better systems in place, and that
19 included, you know, agreements.
20 Q All right. Let's talk about Carlos Lopez. Did
21 Carlos Lopez sign an independent contractor agreement
22 with Avant Assurance?
23 A The same answer that I gave for Delio, I don't
24 know if he actually signed one, but I'm inclined to say
25 no.



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1 Q And Rafaela Valiente, did she ever sign an
2 independent contractor agreement with Avant Assurance?
3 A I wouldn't know.
4 Q And even though Delio Batista, Rafaela
5 Valiente, Carlos Lopez and Mariana Lopez did not sign
6 independent contractor agreements or you're not sure if
7 they did you still considered them independent
8 contractors?
9 A Yes.
10 Q Okay. Why is that?
11 A That was their request.
12 Q When did they make that request?
13 A In multiple occasions.
14 Q Did they make that request directly to you?
15 A Yes.
16 Q Did they make that request in writing?
17 A They did.
18 Q And in writing, was that through an e-mail?
19 A Yes.
20 Q Do you know if you've sent any of those
21 e-mails where they requested to be independent
22 contractors over to us or my law firm?
23 A I'm not sure.
24 Q Do you still have access to those e-mails
25 where the Plaintiffs are requesting to be considered



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1 independent contractors?
2 A Yes, we should have access to them.
3 MR. CUETO: Yeah. Mr. Toussaint, I think we
4 did send them over but again I'll be happy to
5 double check.
6 MR. CUMMINGS: Okay. No problem. I mean, if
7 you sent them over, it was probably in the same
8 production that I've been going through.
9 So, I mean, some of the, a lot of this is in
10 Spanish, so you know, it could have slipped me that
11 way.
12 MR. CUETO: Right.
13 BY MR. CUMMINGS:
14 Q Yeah, I'm not sure let me just ask, you know,
15 Mr. Cortes, did you mainly communicate with the
16 Plaintiffs' in Spanish by e-mail?
17 A With some of them, yes.
18 Q And do you remember which of the Plaintiffs'
19 you know, exclusively communicated with in Spanish?
20 A That's probably Rafaela.
21 Q As far as you know, Carlos Lopez spoke Spanish
22 and English?
23 A He was able to speak English.
24 Q Okay. Did you want to add anything?
25 A No.



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1 Q Okay. As far as you know Delio Batista, did
2 he mainly communicate in Spanish or English?
3 A He was fully bilingual, English and Spanish.
4 Q Okay. And Mariana Lopez, was she bilingual
5 also, as far as, you know?
6 A She was able to communicate in English as
7 well, so it was both English and Spanish.
8 Q Now, let's just go through each person, Delio
9 Batista when did he request to be an independent
10 contractor?
11 A Initially when he first became an agent, and
12 then he reiterated his request in multiple occasions.
13 Q And how would that topic of conversation come
14 up, was the -- was Mr. Batista saying, just walking up
15 to you randomly and saying, "Hey, I want to be an
16 independent contractor" or was there some kind of
17 conversation that led to him making that request?
18 A I wouldn't recall exactly, but it was a mutual
19 understanding, a mutual agreement.
20 Q When Mr. Batista first started working for --
21 well, let me ask you this. Did Mr. Batista start
22 working, for Avant Assurance in 2020?
23 A Probably was in 2020, but I'm not sure.
24 Q Okay. And I know you said that Avant
25 Assurance first opened in 2020. So, was Mr. Batista one



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1 of the first producing agents that Avant Assurance
2 worked with?
3 A He probably was.
4 Q And when he first came on board, did
5 Mr. Batista say, "I want to be an independent
6 contractor" or was that something that you mentioned to
7 him first?
8 A I don't recall exactly how the conversation
9 came about. All I recall was that we were both in
10 agreement. He wanted to have control of his schedule.
11 And I said, well if you sell great, we both
12 make money, the company and you, if you don't sell, you
13 don't make money. The company doesn't make money, so
14 you're free to come anytime you want.
15 And that's what he was looking for you know,
16 to have a flexible schedule.
17 Q Okay.
18 A He also wanted to work from home, and sometime
19 he decided that the office was a better setting for him.
20 Q Was Mr. Batista allowed to work from home when
21 he wanted?
22 A Yeah, he did work from home. It was the
23 middle of the pandemic. So, you would imagine that
24 people didn't want to be leaving their houses.
25 Q Was Avant Assurance's Kendall office open



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1 during the pandemic?
2 A For the most part, I believe it was. It
3 doesn't mean that we were going to the office. He even
4 had a key to the office because he was either free to go
5 to the office or stay home.
6 Q Did you go to the office during the pandemic?
7 A Not all the time.
8 Q Was there any schedule worked out for the
9 people who were working in the office to be there at
10 certain times so they wouldn't be in contact with other
11 people?
12 A No, they were basically coordinating among
13 themselves which time they were going to go and for how
14 long. Like one of them could show up at 9 a.m. and if
15 they wanted to leave at 2, they would leave at 2.
16 And sometime they would say bye and sometime
17 they wouldn't, they were free to, you know, come and go
18 as they wanted. Just saying if they wanted to step out
19 for lunch, I didn't know that they were out for lunch I
20 thought that they would've been in the restroom. I don't
21 know.
22 So, they were basically a 100% free to go in
23 and out of the office anytime they wanted from the hours
24 that the office was, was open, 9 to 9, you know.
25 Q Okay. Who opens the office in the morning?



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1 A Sometime it will have been me or, or any other
2 agent that may have had a key.
3 Q Okay. Well do all agents get keys when they
4 start working with Avant Assurance?
5 A Not all because just a handful of them. They
6 have a key, if you ask me exactly who had a key, I
7 wouldn't know everybody that had a key to be honest.
8 Q And we're talking about the Kendall office at
9 this time, correct during the pandemic?
10 A Correct.
11 Q When the office moved to Doral, did Delio
12 Batista have a key to the Doral office?
13 A That I don't remember.
14 Q All right. Now switching over to, let's just
15 say Rafaela Valiente, did she also request to be an
16 independent contractor?
17 A Yes.
18 Q Excuse me. Who worked at Avant first, was it
19 Delio or was it Rafaela?
20 A No, I certainly don't remember.
21 Q Did you know Ms. Valiente before she started
22 working with Avant Assurance?
23 A So, she was referred to us by another agency
24 that we're partnered with.
25 Q What's that agency?



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1 A The name of the agency?
2 Q Yes.
3 A Yeah, it's called Ashley as in the furniture
4 store. And then -- and I don't know what's the rest of
5 the name, but it's Ashley something, yeah.
6 Q Okay. Just give me one second. I'm sorry.
7 A Okay.
8 Q People are trying to talk to me over here.
9 Give me a second. Okay. All right. So, I'm sorry, you
10 said Ashley and you said you don't remember the name,
11 the rest of it?
12 A The full name, correct.
13 Q Okay. So, do you still partner with that,
14 insurance agency?
15 A Yes.
16 Q Are you an owner of that agency?
17 A No.
18 Q Do you know the owner of the agency?
19 A I know the principal producer for the agency.
20 I don't know if they actually own the agency.
21 Q Okay. Who's that?
22 A So there's a person called Yuri Rodriguez.
23 Q Did you say Julius?
24 A Y-U-R-I.
25 Q I see. Okay.



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1 A As in the cosmonaut. Yeah.
2 Q Okay. I understand. All right. So, either
3 way, Rafaela came over from Ashley and then started
4 working with Avant, correct?
5 A She started producing, yes.
6 Q Okay. Did Ms. Rafaela Valiente work in the
7 Kendall office?
8 A For the most part, yes.
9 Q Okay. Do you know if Ms. Valiente was an
10 independent contractor at Ashley?
11 A She was.
12 Q Okay. How do you know?
13 A Because they told me that they had an agent
14 that wasn't producing enough and that if I had an option
15 for her to help her with generating leads. And I said,
16 yeah, we have an empty spot.
17 Q But did you speak to Mr. Rodriguez about
18 Ashley -- I'm sorry. Did you speak to Mr. Rodriguez
19 about Ms. Valiente?
20 A In what sense?
21 Q Well, you said that you heard from Ashley --
22 A They approached me.
23 Q They approached you?
24 A Yes.
25 Q Yeah, that's what I mean. Was it -- did you --



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1 when you said they approached you right, because it
2 wasn't the business --?
3 A Yeah, yeah. Yes, Yuri basically.
4 Q Okay. Got it. Okay. So, Yuri came to you
5 and asked you, hey, do you have a spot for a producing
6 agent?
7 A Correct.
8 Q Okay. Now, at that time, did Yuri tell you
9 that Ms. Valiente was an independent contractor with
10 Ashley?
11 A Yes.
12 Q Okay.
13 A And there was different because she asked if
14 she worked out of the office. She tried to work out of
15 her own house, and then she went back to the office
16 because she said that her internet and her computer at
17 home was, were not good.
18 Q Okay.
19 A Plus the office environment, the office
20 setting, hearing other agents selling was making her
21 feel better and picking up on her, stretching their
22 skills, I guess, her skills.
23 Q Okay. So, at first she tried to work from --
24 Ms. Valiente tried to work from home, but then she moved
25 back into the office?



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1 A That's correct. And there was also another
2 period of time, I don't recall exactly the year where
3 she left the office for a month.
4 She went to work at a warehouse on an hourly
5 basis because that's what she told me, as an employee.
6 And then she returned back to us.
7 Q Okay. And during the time when she was working
8 at the warehouse, she was not working with Avant --?
9 A Correct, it was like a full month.
10 Q Okay. And she did not work for Avant during
11 that time?
12 A She did not.
13 Q Do you remember about what month or year that
14 was?
15 A I don't know right now, but I could definitely
16 find out.
17 Q And now that you bring that up, do you know if
18 Ms. Valiente worked for any other insurance agencies
19 during the time that she was working with Avant?
20 A That I wouldn't know, but she had that
21 relationship with Ashley. So, it is possible.
22 Q If you found out that Ms. Valiente was still
23 working with Ashley, would you have kept her on at
24 Avant?
25 A What was the question again?



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1 Q Would you have allowed Ms. Valiente to work at
2 Avant Assurance and Ashley Insurance at the same time?
3 A If she did it, she was probably allowed to do
4 so.
5 Q What --?
6 A She wasn't --
7 Q Well you're saying you --
8 A -- she wasn't prevented from doing it pretty
9 much, yeah.
10 Q Do you know if any of the Plaintiffs worked at
11 Avant and worked somewhere else at the same time?
12 Another insurance agency?
13 A That I'm aware of, no.
14 Q But if the agents wanted to work at Avant and
15 another insurance agency that would not have been
16 prevented?
17 A Well, now that I recall, Rafaela was actually
18 contracted with CR Insurance at the same time that she
19 was producing with Avant. So yeah, they were not
20 prevented from doing it.
21 Q How did you find out that Ms. Valiente was
22 contracted with C -- you said CR?
23 A Yeah, Charlie Rodriguez, CR yeah.
24 Q How did you find out that Ms. Valiente was
25 contracted with CR Insurance?



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1 A She told me.
2 Q All right. And Carlos Lopez, did he request
3 to be an independent contractor?
4 A Yes.
5 Q Okay. Did he have that conversation with you?
6 A Yes, he even wanted to create an agency in
7 order for us to pay his agency.
8 Q Did he eventually do that?
9 A Yes.
10 Q Do you remember the name of his agency?
11 A It was his name ending in PA.
12 Q Is that what you paid his 1099s to?
13 A I'm --.
14 Q Well, sorry -- is that what you paid his -- is
15 that where his pay stubs were paid to?
16 A Pay stub is used for employees. So, commission
17 statements, is what I would call it. It was paid to him
18 as an individual because initially he did not have a
19 licensed entity.
20 And then once the licensed entity was formed
21 by him and everything, then he requested in writing for
22 us to start paying his entity and not him. Whether that
23 actually happened or not, I will have to confirm, but I
24 guess it did.
25 Q Okay.



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1 A And Rafaela I also requested to pay her agency
2 the same for Mariana.
3 Q And what about Delio?
4 A Delio, he wanted to get paid as an individual.
5 Q Okay.
6 A They were free to decide, you know.
7 Q Got it. So basically Carlos, Mariana and
8 Rafaela established their own agencies and that's how
9 they were paid by Avant?
10 A Yes, initially as an individual and then to
11 the agencies.
12 Q And this was before the independent contractor
13 agreements were created by Avant, correct?
14 A Which independent contractor agreement?
15 Q The one I showed you previously at
16 Exhibit A --.
17 A The one that had two attachments?
18 Q No, that was just the e-mail. Hold on, let me
19 go back to it. Okay. All right. Can you see what I'm
20 showing you on the screen now?
21 A Yes.
22 Q Okay. Yeah, this is Exhibit A that I showed
23 you before, is -- I was asking about this document, so
24 just listen to the question for a second again.
25 Did Carlos, Rafaela and Mariana establish



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1 their own agencies to be paid out to before this
2 independent contractor agreement was created?

3 A Yes.

4 Q And just for the record, I'm referring to the
5 independent contractor agreement at Exhibit A. Okay.
6 So, now we previously talked about compensation and you
7 mentioned a two page document.

8 So, I think during the break I found the
9 document you were referring to, so let me show you that
10 now. All right, I'm now going to show you what I'm
11 marking as Exhibit D for the deposition record.

12 (Thereupon, Plaintiffs' Exhibit D was entered
13 into the record.)

14 BY MR. CUMMINGS:

15 Q Okay. So, can you see the document I'm
16 showing you on your screen now?

17 A Yes.

18 Q Okay. Is this the document you were referring
19 to about the compensation for agents?

20 A There's more to a document, right?

21 Q Yeah, I'm going to scroll down.

22 A Okay.

23 Q But this is a two page document?

24 A Yes, that's probably the document.

25 Q Okay. Now you say probably a lot and that

1 kind of scares me. So, I'm -- I need to know whether or
2 not you are certain that this is the document or you're
3 not certain.

4 A Well, I don't have the document with me, so
5 I'm not able to inspect that as I need to in order to
6 affirm that that is a document or not.

7 Q Okay. So, I mean, I'll just let you know that
8 this document was provided by Avant Assurance in
9 discovery in this case, at the bottom of the first page
10 it says Avant Assurance versus Lopez and then it has a
11 number here, 22.

12 Now, I don't expect you to know what that
13 means, but that means that we received it from your
14 business essentially, because we asked for it in what's
15 called the request for production.

16 So, this is the date stamp number here, 22 and
17 23 on both of these pages. So, what I can confirm is
18 that this document came from Avant.

19 Now what it's supposed to be, you would know
20 that better than me. So, do you know what this document
21 is supposed to be?

22 A So, it's supposed to be the compensation
23 agreement.

24 Q Okay. Now it says 2022, was there a different
25 compensation agreement plan in place in 2020 and 2021?

1 A I'm not sure to be honest.

2 Q Okay.

3 A This one I do recall the specifics because you
4 have numbers in there. I will have to confirm my end
5 and those are the numbers.

6 Q Okay. Now who created this document that
7 we're looking at in Exhibit D, this two page document?

8 A I did.

9 Q And you're saying that you don't remember if
10 you had one for 20 -- a document like this in 2021?

11 A Yeah, I don't recall.

12 Q All right. However, there was still a
13 compensation structure in place for agents in 2021,
14 right?

15 A Correct, it was on a per sale basis.

16 Q Okay. So, it was different from this
17 compensation plan that we're looking at here?

18 A It was probably different because every year
19 the insurance company changed the compensation and we
20 have to make adjustments.

21 Q I see. Okay.

22 A Yeah.

23 Q And would that be the same for 2020 also. It
24 was probably a different compensation plan then?

25 A Yes, it's not definitely -- it is definitely

1 not the same dollar amount. It may not even include a
2 bonus program.

3 Q All right. So, I'll come back to this
4 document in a second, but it brings up another important
5 point I want to ask.

6 When -- let's just talk about commissions.
7 Let's stick with commissions for right now. The
8 commissions that agents at Avant Assurance receive, who
9 comes up with that commission structure?

10 A So, who decides on the compensation plan that
11 was offered to the agents?

12 Q Exactly.

13 A I am.

14 Q Okay. Now is that a negotiation between you
15 and the agents or is it just okay, this is the
16 compensation structure for all agents?

17 A Yeah, it is a negotiation because they're not
18 forced to participate.

19 Q Well, what I mean more so is can, let's say
20 for example, can Delio have one compensation plan and
21 then Mariana has a different one, and then Carlos and
22 Mariana, like all four have four different compensation
23 plans or it's the same one that they're all working
24 under?

25 A It was probably the same.

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1 Q Okay.
2 A Yeah.
3 Q All right. Now you mentioned the insurance
4 companies and the compensation plan changing. Does the
5 insurance company's procedures affect how you structure
6 compensation that goes to -- let me rephrase that.
7 Sorry, the question's confusing. How do you
8 determine what commission the insurance agents are going
9 to receive?
10 A The dollar amount?
11 Q Sure.
12 A Okay. So, if a company is paying more, they
13 get paid more, simple right.
14 Q Got it. All right. Now, so does that mean
15 that the insurance company tells Avant Assurance how
16 much they are going to pay for each customer that's
17 signed up?
18 A Correct.
19 Q Okay. What is that dollar amount based on, is
20 that based on the premium that the customer is paying?
21 A No, it's a set fee.
22 Q Set fee. Okay.
23 A Excuse me, Toussaint and everybody, I'm going
24 to have to use the rest room.
25 Q That's no problem.



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1 A I wish I could wait a little longer, but --.
2 Q No, that's no problem.
3 MR. CUETO: Yeah, we'll take 10 minutes. Is
4 that okay?
5 THE WITNESS: Yeah, that's fine. That's plenty
6 of time.
7 MR. CUETO: All right.
8 THE WITNESS: Okay. Thank you. Sorry about
9 that.
10 (Thereupon, a short discussion was held off
11 record.)
12 (Deposition resumed.)
13 BY MR. CUMMINGS:
14 Q Okay. All right. So, Mr. Cortes, I was asking
15 you about the commissions for insurance agents at Avant,
16 and you were explaining that the company sets a fee for
17 each sale that's closed?
18 A Correct.
19 Q Okay. On average -- well let me ask you this,
20 fee is paid directly to Avant?
21 A Correct.
22 Q Okay. And so every insurance company has
23 their own amount that they pay when they receive a new
24 customer from Avant, correct?
25 A Yes.



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1 Q What is the maximum that an insurance company
2 pays?
3 A What is the?
4 Q What is the maximum amount that insurance
5 company pays?
6 A Before or now?
7 Q For one customer let's say in 2022 at the time
8 when you issued the compensation plan that we were
9 looking at?
10 A Probably \$35, 30 to \$35 per member.
11 Q Okay. So, going back to Exhibit D, if we look
12 at this compensation plan, does this -- those blue boxes
13 or you know, that blue table explain how much the
14 insurance company pays for each member that they
15 receive?
16 A No, that explain how much Avant agreed to pay
17 the agents.
18 Q Okay. Right, so what I'm trying to find out
19 is how much, for example, let's just say Ambetter, how
20 much does Ambetter pay Avant for receiving one customer?
21 A It could be, like I said, from 30 to \$35.
22 Q Okay. And so the whole amount is then passed
23 over to the insurance agent?
24 A The whole amount?
25 Q Yeah, for commission because isn't this



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1 telling -- excuse me. Is this document here at Exhibit
2 B, I'm sorry, Exhibit D, telling us how much you're
3 going to pay an agent for closing a sale?
4 A Correct, so what this says is that it is a
5 one-time payment, if you read letter D commission and
6 bonus compensation will be issued as a one-time payment
7 in the case of Ambetter, for example, it says \$35.
8 So, that means that they will get \$35 per each
9 member that they enroll into Ambetter as a one-time
10 payment.
11 Q Exactly. Now I understand. And so for example,
12 if I'm an insurance agent working with Avant and I
13 close, you know, two sales for Ambetter, then I get \$70,
14 right?
15 A Based on this schedule, yes.
16 Q Right. But how much does Avant make for those
17 same two sales that are closed, how much does the
18 insurance company pay Avant?
19 A So, Avant will be paid on a monthly basis as
20 long as the policy is active. So, it could be that it
21 was active for a month, Avant made a loss because we
22 paid out the agent and there's nothing to recoup from.
23 If the policy was active more than a month, then Avant
24 will make some money.
25 Q Does Avant make money one time off of a



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1 customer that's sold, or do you make continually make
2 money off that customer?
3 A As long as the policy is active.
4 Q Right. So, okay -- so let me just say, let's
5 give you an example, a hypothetical here you know, a
6 customer signs up on January 1st, 2023 for Ambetter,
7 right?
8 A Uh-hum.
9 Q Okay. Using this example, I'm not saying that
10 these are the 2023 numbers, but using this example then,
11 when does Avant get paid if the customer signed up on
12 January 1st, 2023?
13 A It could be anywhere from 45 to 60 days after
14 the effective date.
15 Q Okay. Now, let's say that the customer stays
16 with Ambetter for the whole year, 2023. How often does
17 Avant get paid for that one customer from Ambetter?
18 A Monthly.
19 Q Monthly. Okay. And then how much does Avant
20 receive, \$35 every month?
21 A If it was 35, yes, but it could have been 30.
22 That would depend on the state and the carrier.
23 Q Okay. Understood. But is there any case
24 where Avant is paying the agent more than what the
25 insurance company is paying for the customer being sold?



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1 A I will have to confirm on the actual schedule
2 that the companies pay Avant. I don't know what's the
3 answer right now.
4 Q Okay. All right. But I mean, just business
5 wise speaking, right like if act close a customer and, I
6 know that Ambetter is going to pay -- let me put it like
7 this.
8 If I'm you and I know that Ambetter's only
9 going to pay me \$35 per month for this one customer, are
10 you going to pay your agent more than \$35?
11 A No, because I wouldn't have money to pay from.
12 Q Okay. That all I'm really trying to figure
13 out.
14 A Okay.
15 Q Okay. I understand. Okay, I got it, I see
16 what you're saying. All right. Now, how long does
17 Avant continue to make money off of one customer that
18 sold, as long as they have the insurance policy?
19 A As long as they're active.
20 Q As long as they're active with the
21 insurance --.
22 A And as long as Avant's agent of record is on
23 the application.
24 Q Which application are you talking about?
25 A On the customer's application, if another



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1 agent sells the same customer, then Avant's agent of
2 record is no longer the agent of record, hence doesn't
3 receive compensation after that.
4 Q Okay. But now I'm just trying to figure out
5 what document you're referring to because before when I
6 asked what documents have to be filled out, I don't
7 remember you mentioned that an application, you just
8 said that an agent goes into the Radius BOB they click,
9 you know, let's say Ambetter, and then I'm not sure what
10 kind of magic happens, but now you're mentioning an
11 application. So, what's this application that you're
12 referring to?
13 A So application is the form that the agents
14 fill into the CRM. And that's an application that's a
15 way of saying it. It's not an actual application.
16 Q Okay.
17 A That the customer doesn't need to sign.
18 Q The customer does not sign it?
19 A Exactly.
20 Q Okay. All right. But the agent's name goes
21 on that document?
22 A On which document?
23 Q What you refer to as an application?
24 A No, so the agent's name only goes into a CRM
25 because the policies are owned by Avant. And so it goes



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1 the Avant principles agent, in charge name on the
2 insurance policy, so that's a better word, insurance
3 policy and then there's the application.
4 Q Okay. So, the insurance policy itself and
5 that policy is a contract between which two parties?
6 A The insurance agency and the insurance
7 company.
8 Q Understood. Okay. All right. And that policy
9 essentially says that the customer wants insurance from
10 the company, but the agency, which is Avant, is
11 providing the customer?
12 A What was the question again?
13 Q The policy that you're talking about
14 essentially says that the customer wants insurance,
15 let's say from, Ambetter and Avant is providing the
16 customer, is that what that policy essentially says?
17 A No.
18 Q Okay. What is the policy saying?
19 A Policy is an insurance term it's not like we
20 have a policy in place. I don't know if you understand
21 the difference.
22 Q Right. I mean, I understand what an insurance
23 policy is, but --
24 A Um-hum.
25 Q As the person who's getting the insurance, my



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1 name and my signature should be on it, I would assume,
2 right? The -- right, because in this situation, Avant
3 Assurance is not getting, I'm sorry, Avant Assurance is
4 not the one that's getting the insurance, right?
5 A It's the member, the beneficiary.
6 Q Okay.
7 A I'm not sure what you're trying to ask to be
8 honest.
9 Q No, you answered my question actually. That
10 makes sense. All right. So, where are those pol --
11 does Avant keep a record of all of those policies?
12 A Which policies?
13 Q The policies that are -- have the agents'
14 signature on them once they sign a customer.
15 A So the agent doesn't sign the policy.
16 Q Who signs the policy?
17 A Nobody signs the policy. The policy is issued
18 by the insurance company. It doesn't require a
19 signature.
20 Q When is the policy issued by the insurance
21 company?
22 A I don't know. I mean, the insurance company
23 had their own, I guess, systems in place on when they
24 issue a policy.
25 Q And then they send the insurance -- the policy



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1 back to Avant?
2 A No, they send it to the end customer.
3 Basically, they send a letter with a policy number and
4 sometimes they give an ID card.
5 Q Okay. How does Avant know that a customer has
6 been signed up by an insurance company?
7 A When we get a statement that we're getting
8 paid on.
9 Q So, if an agent signs up a customer or a
10 potential customer, then that sale is not considered
11 complete until a statement comes back from the insurance
12 company?
13 A That is correct, if you recall from before,
14 another agent could have sold the same member exactly
15 the same policy.
16 So, the last agent on record is the one that
17 is going to remain for the insurance company.
18 Q How long does it generally take between a
19 agent signing a potential customer and Avant receiving a
20 statement back from the insurance company?
21 A Like I said before, 45 to 60 days. It could
22 be more, it could be less. So, it varies each company
23 have their own I guess compensation cycle.
24 Q Okay. And so that's why when we look at part
25 A here, it says in Exhibit D, "The policy must be active



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1 and paid by the insurance carrier?"
2 A Correct. Yeah, if we don't get paid basically
3 we don't have any money to pay out to any agents.
4 Q Okay.
5 A Yeah.
6 Q Now, when we look at part B where it says each
7 commission payment will be paid as it is being received
8 by insurance companies, whereas multiple payments will
9 occur on each month. What does that mean?
10 A You have company A, company B, company C one,
11 pay you on the first couple days after we pay the agent.
12 Company B pays you on the 10 of the month, couple days
13 after we pay the agent.
14 So, that means that the agent's going to
15 receive multiple payments throughout the same month,
16 depending on when Avant got paid.
17 Q Okay. And then going on to the second
18 sentence, it says, insurance companies and FMO reserve
19 the right to amend commissions, what is FMO?
20 A It's a field marketing organization. Another
21 name for I guess insurance agency.
22 Q Okay. And so in this case, in this particular
23 sentence, does the FMO refer to Avant?
24 A Yes.
25 Q All Right. And you said reserve the right to



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1 amend commissions and bonuses during the 2022 special
2 enrollment period for policies with an effective date of
3 March 1st, 2022 through December 31st, 2022.
4 I'm not going to ask about that right now
5 because I want to talk about open enrollment later. But
6 let me just ask you this really quickly.
7 In letter B where it says 2022 special
8 enrollment period, is that the same as open enrollment
9 or is that something different?
10 A That's different, yeah.
11 Q Okay. What does special enrollment refer to?
12 A That's the period after the open enrollment is
13 over.
14 Q Where a customer has to fit into certain
15 categories in order to still get insurance?
16 A It could be that, yeah.
17 Q All right. Now moving down to the bottom of
18 Exhibit D, where it says there's these asterisks, those
19 little stars "Bright's policy with a super plan will be
20 marked as issue, will not be processed and will not
21 receive compensation". What does that mean?
22 A I'm trying to see the first star.
23 Q Yeah, I'll make it a little bigger for you.
24 A Yeah. So Bright is an insurance company that
25 you see in there number 4.



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1 Q Uh-hum.
2 A And they had a particular plan where there
3 wasn't going to be a compensation.
4 Q Why is that though?
5 A Why what?
6 Q Yeah, why would there be no compensation for a
7 particular plan that's sold?
8 A Because that plan was primarily for consumers
9 to go to certain medical centers that were controlled by
10 another insurance agency.
11 Q Okay.
12 A So, basically members in there were going to
13 be switched to the other insurance agency.
14 Q Okay. And then basically the same thing for
15 that Florida Blue?
16 A Florida Blue, because we don't have a contract
17 with Florida Blue.
18 Q When you go above to where it says BCBSIL what
19 does that -- is that Illinois?
20 A Illinois.
21 Q Okay. And then same thing, BCBS Texas?
22 A Texas.
23 Q All right. So, Avant Assurance does not have
24 any affiliation with Florida Blue, but it does have
25 affiliation with certain Blue Cross Blue Shields in



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1 other states?
2 A Correct.
3 Q All right.
4 A Florida Blue they're -- they work on an
5 independent contractor basis with the producers, and
6 they require, as part of the agreement for the producers
7 to be exclusive, pretty much, they're not allowed to
8 sell other products other than Florida Blue.
9 Q Okay. All right so let me just stop this for
10 a second. If I'm an agent working at Avant Assurance,
11 how do I keep a record of all of the policies that I've
12 sold, is that only through Radius?
13 A If you're an agent, it depends. If you're an
14 agent that is using Radius, yes, you could use Radius
15 for that purpose. If you're using another platform, you
16 could be tracking another way.
17 Q Okay. Well, I think you previously said that
18 some of the agents use, what like spreadsheets -- Excel
19 spreadsheets?
20 A A spreadsheet, yeah.
21 Q All right. Did you ever have any disputes with
22 any of the Plaintiffs' in this case about the amount of
23 money they were supposed to be receiving from sales that
24 they closed?
25 A Not that I recall.



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1 Q If an agent had a dispute about the amount of
2 money they received, who would they make that complaint
3 to at Avant?
4 A To me.
5 Q And do you keep a record of all of the
6 payments, the commission payments that you make to all
7 of the agents?
8 A Yes.
9 Q How do you keep that record?
10 A In an excel form.
11 Q And as far as you know, have you already
12 turned over all of the payments that were made to the
13 Plaintiffs' in this case?
14 A Yeah, I believe so. The ones that we have.
15 Q Now, you said that you keep it in a -- in an
16 excel form, is that right?
17 A Correct.
18 Q Okay. So, explain that process to me. When
19 you receive payment from an insurance company, do you
20 look to see which agent sold that particular policy?
21 A That is correct.
22 Q Okay. Now, once you find out which agent
23 sold -- well, how do you know which agent sold the
24 policy?
25 A The CRM.



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Delio Batista, Carlos Lopez, Mariana Lopez, Rafaela Valiente vs Avant Assurance
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1 Q So, you go on the Radius and the Radius tells
2 you which agent sold that policy?
3 A Exactly.
4 Q Okay. So, let's just use Ambetter as an
5 example. Ambetter sends Avant Assurance a policy
6 through what, e-mail or through regular mail?
7 A A policy?
8 Q Yeah.
9 A They don't send the policy to us.
10 Q What do they sent just payment?
11 A A commission statement.
12 Q Commission statement. Okay.
13 A Similar to the one that you saw that we had
14 sent to the -- to your clients.
15 Q How do you receive that commission statement,
16 is that through e-mail?
17 A No, they post it in their portal, it's in an
18 Excel form.
19 Q Okay. All right. So, now does the -- so, the
20 statement doesn't say the commission statement from the
21 insurance company does not say which one of Avant's
22 agents sold the policy, right?
23 A It's going to have an agent's name attached to
24 the policy but it's not necessarily the agent who sold
25 the policy.



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Delio Batista, Carlos Lopez, Mariana Lopez, Rafaela Valiente vs Avant Assurance
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1 Q What is an NPN?
2 A National Producing Number.
3 Q All right. What does it identified though?
4 A An agent.
5 Q Does the commission statement have a NPN on
6 it?
7 A In some cases.
8 Q How would the insurance company know the NPN
9 for an agent?
10 A That's public record. Just like your license
11 might be public record.
12 Q Okay. Are -- does each agent that works for
13 Avant have their own NPN?
14 A Yes.
15 Q Do you have an NPN?
16 A Yes.
17 Q All right. Now, you previously mentioned that
18 the agent that sold the policy may not be the agent
19 who's on the commission statement, is that what you
20 said?
21 A That is correct.
22 Q How would that happen?
23 A Because I will be the one in the -- as the
24 agent of record for the company.
25 Q So, sometimes your name is on the commission



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1 statement for a policy?
2 A For the most part, it should be my name.
3 Q All right. Now, once you get a commission
4 statement, what do you do with it, from an insurance
5 company?
6 A I pay all the agents.
7 Q So, just walk me through that step by step.
8 You get a commission statement the commission statement
9 has a customer's name on it?
10 A Yes.
11 Q Okay. That customer's name then you reference
12 that back through Radius?
13 A Correct.
14 Q And then how do you pay the agents, is that
15 just a check or is that through direct deposit?
16 A Mostly it would have been direct deposit. It
17 could be that one of them received a check once or
18 twice, yeah or even a Zelle payment.
19 Q And how long of a delay is there between when
20 you get a commission statement back and when you issued
21 a check out to the agent?
22 A It's a couple days for the most part.
23 Q All right. Now, aside from commission, do
24 agents earn any other type of compensation that you know
25 like you would consider a salary or like an hourly



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1 compensation?
2 A Which agents?
3 Q The producing agents?
4 A The one that are suing us or the employees
5 that we have today.
6 Q The ones that are suing you?
7 A No, there was no other component other than
8 commission and bonuses.
9 Q Okay. So, let's talk about bonuses. Going
10 back to Exhibit D. We see that page 2 of Exhibit D
11 talks about a bonus plan and it says OEP, what does that
12 stand for?
13 A Open enrollment period.
14 Q Were bonuses only given to the Plaintiffs'
15 during the open enrollment period?
16 A That's when bonuses were only available in
17 general.
18 Q And when you say in general, you mean to all
19 producing agents?
20 A Correct, in the industry.
21 Q Yeah. Could Avant decide to give bonuses
22 aside from open enrollment period bonuses?
23 A If Avant had a way to generate the extra money
24 probably, Avant had the option to do it but we never did
25 it because.



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1 Q So, since 2020 -- were bonuses paid out to
2 produce an agents in 2020?
3 A What's the question?
4 Q Were bonuses paid to produce an agents in
5 2020?
6 A That I don't remember.
7 Q Were bonuses paid to produce an agents in
8 2021?
9 A That I do not recall.
10 Q Well, let's think about 2020. In 2020, was
11 Avant formed before or after open enrollment period?
12 A September.
13 Q September, 2020?
14 A Yes, which was a handful of months.
15 Q When is open enrollment period?
16 A November.
17 Q To what?
18 A Back then, I don't know if he went all the way
19 through January or just through December, because they
20 changed the dates.
21 Q Okay. So, it seems like in 2020, Avant opened
22 just in time for open enrollment, correct?
23 A It was about it, yeah.
24 Q Okay. Did Avant sell policies during open
25 enrollment in 2020?



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1 A In 2020, yes.
2 Q Okay. Who decides the bonus that the agents
3 will receive?
4 A Where, which bonus?
5 Q The open enrollment period bonuses?
6 A I'm not sure about your question.
7 Q Yeah, so --.
8 A Agents in general, right?
9 Q Say it again?
10 A Agents is general, you'd be referring to
11 general agents in the market, in the industry or
12 producing agent for Avant.
13 Q Yeah, just for Avant.
14 A Okay.
15 Q Just for Avant, who decides the bonuses that
16 producing agencies for Avant are going to receive?
17 A I will.
18 Q All right. And what is that based on the
19 bonus that they receive?
20 A Based on what the companies were offering at
21 the time and based on, I guess, production requirements
22 that they had and they needed to be in good standing
23 producing with the agency.
24 Q What does good standing mean?
25 A Actively producing because there's a retention



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1 that we get measured from the insurance company before
2 they pay the bonuses.
3 So, if we're no longer producing for an
4 insurance company then we don't get the bonus because
5 it's not to their benefit to pay a bonus if the agent is
6 no longer active to maintain the member when a member
7 has a question.
8 Q Okay.
9 A So, it comes from the insurance agency and we
10 pretty much mirror what they do.
11 Q Okay. So, does that mean that after a
12 customer is signed up with a policy that the agent that
13 closed it still has a responsibility to follow up with
14 that customer or be responsible for taking their calls?
15 A So, if a member had a question, it would be
16 referred back to the agent who sold the policy.
17 Q I see.
18 A If the agent was still producing.
19 Q Got it. And if the agent -- well, if the
20 agent is still producing or if the agent is still
21 working for Avant?
22 A The same, producing for Avant.
23 Q I see. Okay.
24 A Yeah.
25 Q And if the agent is not still producing for



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1 Avant then who handles that members call?
2 A Well, it will be my responsibility.
3 Q Okay. So, let's look at this bonus plan here,
4 it says Oscar, Florida and Texas only, new and renewal
5 members, and then members tiers 300-349. What does that
6 mean?
7 A So, if they sold between 300-349 members, they
8 will get 5,000.
9 Q And that's just during the open enrollment
10 period if they sell that many members?
11 A Correct.
12 Q And so in 2022, bonuses could only be received
13 for Oscar, Ambetter and Friday?
14 A Oscar, Ambetter that we made available to the
15 agents, yes.
16 Q So, bonuses were not available or bonuses were
17 not received if other plans were sold that were not
18 Oscar Ambetter or Friday?
19 A Yeah, no not all the companies offer bonuses.
20 Q But then Number 4 on this page says, overall
21 production comp -- bonus from all insurance companies.
22 And then it says from October, 2000 -- or 25th, 2021, to
23 January 28th, 2022.
24 So, when it says, "All insurance companies,"
25 does that mean Oscar, Ambetter or Friday or all of the



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1 insurance companies that the agents sell for?
2 A That meant all the insurance companies.
3 Q So, I thought you said that all the insurance
4 companies don't pay bonuses though?
5 A That is correct.
6 Q Okay. So, it seems to me like you've been
7 saying the only money that you kick out is money that
8 you receive in. So, if all of the insurance companies
9 aren't paying bonuses then where is Avant making up the
10 money to pay out these bonuses from all the insurance
11 companies?
12 A Out of our commissions when we did not get a
13 bonus payment.
14 Q Just during the open enrollment period, you
15 mean?
16 A Correct. It was an incentive for the agents
17 to produce for all companies and not just to focus on a
18 single bonus.
19 Q During the open enrollment period, are agents
20 still receiving the commissions that we saw on the
21 previous page?
22 A Can you repeat the question?
23 Q Yeah. During open enrollment, are agents
24 still receiving the commissions that they received on
25 Page 1?



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1 A I don't understand your question.
2 Q Okay. So, let's say, you know, I'm -- an agent
3 during the open enrollment period, is selling Ambetter,
4 but they only sell 200 customers or 200 policies for
5 Ambetter. They receive commission for those 200,
6 correct?
7 A Yes. That's independent from the bonus.
8 Q Exactly. Okay. All right. Understood. Now,
9 going down to Number 5, it says, "Agency's overall
10 production bonus." All right. So, if the agency meets
11 the goal of 13,000 policies at the end of the open
12 enrollment period, does that mean each agent will get
13 \$10,000?
14 A Correct.
15 Q Did that happen in 2022?
16 A Unfortunately, no.
17 Q How many policies were sold during open
18 enrollment in 2000 -- well, during that the 2021 to 2022
19 open enrollment period?
20 A It was way less than that. I don't think it
21 even went over 10,000.
22 Q All right. Did anybody receive -- did any of
23 the Plaintiffs receive an overall production bonus
24 that's listed in Number 4?
25 A I don't recall, Toussaint.



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1 Q Did any of the Plaintiffs say to you that they
2 were entitled to the overall production bonus that's
3 listed in Number 4?
4 A I don't recall.
5 Q Did any of the Plaintiffs receive any bonus
6 from the open enrollment period in 2022?
7 A All of them did receive some bonuses and
8 Mariana received all of her bonuses with the exception
9 of 4 and 5 definitely -- nobody did because we didn't
10 meet as an agency and 4, that's the one that I would
11 have to check if she qualified for that or not. I don't
12 know.
13 Q Okay. But you're saying that Mariana would've
14 received bonuses from tiers -- from Numbers 1, 2, and 3?
15 A Correct.
16 Q Now, you made it a point to say that the other
17 Plaintiffs meaning Delio, Carlos and Mariana sounds like
18 did not receive all of their bonuses. Why was that?
19 A Because they were not actively producing for
20 the agency at that time that we received and paid out
21 the bonuses. That was one of the requirements that the
22 company had on us and then we passed it on to the
23 agents.
24 Q Okay. So, the company actually has -- let's
25 say, you know, it's Oscar, Oscar has a requirement that



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1 the bonus is only paid out to an agent if they are still
2 actively producing at the time that the bonus is paid
3 out?
4 A Yes. I don't know if you have received it
5 already, but if not, I'm sure we could send it your way,
6 but it's a sample agreement where the agents -- the
7 insurance company requires the agent to be producing in
8 good standing for the agen -- the company.
9 Q Right. I don't think we did receive that. So,
10 what's the name of that document?
11 A I'm not sure what's the name of it, but I'm
12 sure we could send it your way.
13 MR. CUETO: Yeah. To the extent we didn't
14 produce it, I'll guess we'll have to see which one
15 it is specifically because I'm not sure which one
16 you're talking about.
17 BY MR. CUMMINGS:
18 Q Okay. Got it. Now that -- is it a contract
19 or is it just a document that's sent over to the Avant
20 Assurance, the one that you were just referring to?
21 A It's an agreement.
22 Q It's an agreement. It's an agreement between
23 Avant and the insurance company or the individual agent
24 and the insurance company?
25 A So, the insurance company and Avant.



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1 Q Okay. And then that agreement you show to the
2 agents or you just tell them about it?
3 A Which agreement?
4 Q The agreement you're talking about that talks
5 about how the bonuses are given?
6 A No. This is the agreement that the agents
7 received, the one that we have on the screen.
8 Q All right. They received this in particular,
9 but this is not the agreement that came from the
10 insurance company. This is just something that you
11 created to tell them about it, right?
12 A Correct.
13 Q Got it. Okay. And what you're referring to in
14 particular at the bottom is the star where it says,
15 "Bonuses will be paid in April 2022 or once we receive
16 compensation from the insurance companies, agent will
17 need to be actively producing for the agency at the time
18 of payment," right?
19 A Yes.
20 Q So, that's what the contract says and then you
21 just paraphrase it here?
22 A Correct.
23 Q Got it. Now, what does actively producing
24 mean?
25 A Meaning that they're seeking to get customers



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1 for the agency.
2 Q Is actively producing a term that comes from
3 the insurance company or is that a term that comes from
4 Avant?
5 A That's a standard term, because you could have
6 a contract and you are not producing.
7 Q Right. Okay. Is actively producing a term
8 that's defined in the contract that you received from
9 the insurance companies?
10 A That I'm not sure.
11 Q What happens to the bonus money that comes in
12 from a company -- well, no, let me ask a separate
13 question. How does the insurance company know if an
14 agent is actively producing?
15 A Because they're actively receiving business.
16 Q But what time period --
17 A From the agent.
18 Q Right. What time period would that be? So,
19 for example, let's say you know, an agent worked a whole
20 open enrollment period. They sold a whole bunch of
21 policies during open enrollment period. Open enrollment
22 period ends in January 28th, 2022 and the agent is still
23 selling policies for the insurance company in February
24 and March. Does that qualify as actively producing?
25 A Yeah. He is actively selling.



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1 Q What if in February and March, the agent only
2 sold one policy for the insurance company. Is that
3 qualify as actively producing?
4 A He is selling, yes.
5 Q Okay. But if an agent sells no insurance
6 policies in February and March, they're not actively
7 producing?
8 A Correct. It could be that he's prone to be
9 terminated soon for lack of production.
10 Q And then in that case the insurance company
11 decides they're not going to pay a bonus to that
12 particular agent?
13 A In some cases that could be their decision. I
14 wouldn't know what's their decision.
15 Q Okay. Who has the final decision on whether
16 or not a agent receives a bonus?
17 A The insurance company.
18 Q Okay. Is there any kind of appeals process
19 for agents to receive their bonus?
20 A They will have to prove that the policy was
21 active during the period that the insurance company was
22 paying and that they were in good standing with the
23 insurance company.
24 Q Okay. So, when we say actively producing,
25 does actively producing only refer to the policies that



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1 the bonus is going towards or it's for the policies that
2 come after the open enrollment period?
3 A So, those policies were already produced. So,
4 it means actively in present time, continue producing
5 and bringing new business for the insurance company.
6 It's a retention mechanism, the insurance
7 company have in place in order to, I guess encourage
8 agents to continue producing for them to provide
9 services, you know.
10 Q Right.
11 A It's an incentive.
12 Q Okay. All right. And when the bonuses are
13 paid, does the insurance company just send a check to
14 Avant Assurance for each individual agent?
15 A Correct. Not a check, is the same form that
16 we get the statements, electronic deposit.
17 Q Electronic. But that goes into -- does it go
18 into a trust account for Avant?
19 A It goes, what?
20 Q Does it go into a trust account for Avant?
21 A It goes into a bank account, correct.
22 Q Got it. And then Avant pays out the bonus
23 from that bank account to the agents?
24 A That is correct.
25 Q And is there a document from the insurance



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1 company that shows how much money each agent is supposed
2 to receive as a bonus?
3 A Not always. Sometimes they just give you the
4 list of the customers.
5 Q And then it's Avant's job to figure out, to
6 multiply each customer by the number that the bonus is
7 supposed to be for each agent?
8 A Or we request them to have the -- to include
9 the agent on record for each of the policy and then they
10 sent that to us.
11 Q But wouldn't you be the agent on record?
12 A Yes.
13 Q So, then how do you know which agent actually
14 sold the policy?
15 A So, I will have to go back to the CRM, the
16 same process that we do with commissions and match it
17 against commission. And that will be very simple
18 because by the time that we get paid, we had already
19 paid out commission for six months before.
20 So, it's all a matter of us comparing those
21 commission statements against the bonus statement. And
22 if it's there attached to an agent's name then it
23 belongs to the agent.
24 Q Okay. All right. You mentioned earlier that
25 the office is open from 09:00 a.m. to 09:00 p.m. Was



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1 that the schedule in Kendall?

2 A It could be that we closed certain days
3 earlier or that we open up later on certain days, but
4 normally it would be 09:00 to 09:00.

5 Q Can any agent show up to the office before
6 9 o'clock, will the doors be open?

7 A They could, whether they were able to get in
8 or not, that I don't know.

9 Q Who is generally the first person in the
10 office?

11 A That would vary.

12 Q What are the office hours for the Doral
13 office?

14 A Right now?

15 Q Yeah.

16 A Same 09:00 to 09:00.

17 Q Were the hours the same during in open
18 enrollment period in 2022?

19 A For the office?

20 Q Yeah.

21 A Yeah, throughout the year.

22 Q And do agents have to be into the office at a
23 particular time to start work?

24 A No. They were coming anytime they wanted.
25 There were cases that we're missing calls because we



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1 didn't have agents in the office. There's nothing that
2 we could have done.

3 Q When agents missed calls because they weren't
4 in the office, were they disciplined in any way?

5 A No. They were just not going to make any
6 money just like Avant.

7 Q Is there a discipline system in place at
8 Avant?

9 A For employees or for independent contractors?

10 Q Let's talk about employees first.

11 A For employees, yes, we do.

12 Q Okay. Is there a written discipline system
13 for employees?

14 A Yes.

15 Q Who created that written discipline system?

16 A The managers.

17 Q Are you talking -- are you referring to
18 Katrina and Alix?

19 A It could be, and I could have also been
20 involved.

21 Q All right. Now, let's talk about the
22 independent contractors. Is there a discipline system
23 for independent contractors?

24 A Not really, the only system that will be out
25 there, which is very general compliance, that comes down



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1 from the State Department of Insurance, the insurance
2 companies and CMS, you know, regulatory agencies pretty
3 much.

4 Q All right.

5 A All we have to do is to kind of like monitor
6 what they send to us, the regulatory agencies and if an
7 agent is not compliant with them then we have a duty to
8 do something about it.

9 Q Okay.

10 A It could be to report them, you know.

11 Q Okay. Are the producing agents required to
12 log into the Radius system and record what time they
13 start working?

14 A No. We don't have that, I guess, feature, I
15 don't know how you call it.

16 Q Okay. So, Radius does not keep a track of
17 what time people are logging into it?

18 A No. Sometime they would just lift the -- what
19 is it called the logged in automatically, you know. So,
20 it wasn't like a log in or logout for Radius.

21 Q Was there anything on Avant's computers that
22 logged what time employees were coming in and out of the
23 office?

24 A Not at all.

25 Q Do you have any record of the times that the



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1 Plaintiffs in this case were working for Avant between
2 2020 and 2022?

3 A No.

4 Q All right. Let me just show you what I'm
5 going to mark as Exhibit E for right now.

6 (Thereupon, Plaintiffs' Exhibit E was entered
7 into the record.)

8 BY MR. CUMMINGS:

9 Q Okay. So, I'm showing you what I'm marking as
10 Exhibit E. At the top it says, "Obamacare Insurance
11 Center." Do you recognize this document?

12 A No.

13 Q Okay.

14 A I don't know who prepared this document.

15 Q Got it. All right. Now, we can see that this
16 is mainly in Spanish, so, you know, I understand enough
17 Spanish to understand the days of the week, which goes
18 from Monday through Friday.

19 And then at the bottom we see there looks to
20 be like a key which has like a white box, a yellow box,
21 and a green box.

22 And it says, "open closed" and then the
23 "overtime." It's in Spanish but you know those --
24 that's what those keys mean. You're saying you don't
25 know who prepared this document. Is that correct?



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1 A Yeah, that's correct.
2 Q Okay. And Horario De Agentes
3 (foreign language) I'm assuming that's how you pronounce
4 it, would being an English schedule for agents?
5 A That could be a translation, yes.
6 Q Okay. How would you translate it from Spanish
7 to English?
8 A Yeah. That could be an option.
9 Q Okay. I'm just saying that if there was
10 another way that you would translate it, you know, you
11 could let me know?
12 A No.
13 Q All right. So, was -- do you recognize the
14 names of the people who are on the left side of this
15 schedule?
16 A Yes.
17 Q Okay. And were these people producing agents
18 for Avant Assurance back in May of 2022?
19 A Yes.
20 Q And as far as you know, nobody at Avant
21 Assurance gave the producing agents this schedule?
22 A That is correct.
23 Q Do you have any idea how a schedule like this
24 came to be created?
25 A No. You will need to ask the agents in here.



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1 Q Okay. Do you know --.
2 A Or whoever gave you the document.
3 Q Right. Do you know what the Obamacare
4 Insurance Center is?
5 A Yeah, that's a d/b/a.
6 Q What does that mean?
7 A Doing business as.
8 Q For which business?
9 A For?
10 Q Which business is it a d/b/a for?
11 A For Avant.
12 Q Is that a d/b/a that's registered with the
13 Florida Division of Corporations?
14 A Yes.
15 Q Does the Doral office have a sign outside of
16 it that says, Obamacare Insurance Center?
17 A Outside, no. It says Avant Assurance.
18 Q Got it. Does this logo or does signage
19 Obamacare Insurance Center appear anywhere in the Doral
20 office?
21 A It could be.
22 Q Where could it be?
23 A Maybe in a banner.
24 Q Did you have banners printed up for Avant
25 Assurance?



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1 A If I have what?
2 Q Did you have banners printed up for Avant
3 Assurance?
4 A At this time, I don't think we have any
5 banners.
6 Q Okay. But did you --
7 A Before, yeah, it's probably that we have
8 banners for Avant as well.
9 Q Okay. And did those banners say Obamacare
10 Insurance Center?
11 A They wouldn't say Obamacare, it would Avant.
12 Q I didn't understand that answer would -- what
13 did you say?
14 A So, they will either say Avant Assurance or
15 Obamacare Insurance Center, they wouldn't say both.
16 Q No, I understand that. That's fine. But did
17 you actually go somewhere and have a printer print up
18 banners that said Obamacare Insurance Center?
19 A Not really. I know we have a banner, but not
20 that we printed banners.
21 Q Where would the banner come from that said
22 Obamacare Insurance Center?
23 A It's just a banner that you display, the one
24 that that goes up and down.
25 Q Yeah. But somebody has to create it. Who



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1 created it?
2 A The company, I don't know the vendor's name.
3 Q Yeah. Did you order the banner?
4 A Yes.
5 Q Okay. All right. Now, let me show you
6 Exhibit F for the record.
7 (Thereupon, Plaintiffs' Exhibit F was entered
8 into the record.)
9 BY MR. CUMMINGS:
10 Q Okay. Here we see another schedule. This one
11 is from the week of May 23rd, 2022 to May 27th, 2022.
12 Do you have any idea who created this schedule?
13 A No.
14 Q That was a no?
15 A Yeah, a no.
16 Q Okay. And from May 23rd, 2022 to May 27th,
17 2022, were all of the people on the left side of the
18 schedule producing agents for Avant Assurance at that
19 time?
20 A Yes.
21 Q All right. I'm now showing you Exhibit G.
22 (Thereupon, Plaintiffs' Exhibit G was entered
23 into the record.)
24 BY MR. CUMMINGS:
25 Q And Exhibit G is a schedule from May 30th,



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1 2022 to June 3rd, 2022. Were all of the producing
2 agents working for Avant Assurance during that time?
3 A That I don't recall.
4 Q Okay. Now, I'm showing you -- well, this one
5 is all -- this says agents schedule in English. I'm
6 showing you Exhibit H.
7 (Thereupon, Plaintiffs' Exhibit H was entered
8 into the record.)
9 BY MR. CUMMINGS:
10 Q Just give me a second here. Go back and make
11 sure I mark this right. Okay. All right. Now, I'm
12 going back to Exhibit H, which was the last one.
13 And this one says, "Agent schedule" in English
14 and this is from June 27th, 2022 to July 1st, 2022.
15 Looking on the side at the producing agents, were those
16 producing agents working for Avant Assurance in -- from
17 June 27th, 2022 to July 1st, 2022?
18 A I don't recall.
19 Q Okay. Now, you previously mentioned that
20 Mariana Lopez basically resigned on some Monday in 2022,
21 right?
22 A Correct.
23 Q Do you know what month that was that she
24 resigned?
25 A I think, it was July.



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1 Q All right. And do agents -- producing agents
2 ever work overtime at Avant Assurance?
3 A No.
4 Q Have you ever asked a producing agent to work
5 overtime at Avant Assurance?
6 A Me, no.
7 Q Do you know if anybody who is responsible for
8 managing the agent have asked them to work overtime?
9 A No.
10 Q Okay. I want to show you what I'm marking
11 now --
12 MR. CUMMINGS: Madam Court Reporter, I think
13 we're up to Exhibit I.
14 THE COURT REPORTER: Yes. I have the last
15 Exhibit as H, so the next one would be I.
16 BY MR. CUMMINGS:
17 Q Okay. All right. I'm now going to show you
18 what I'm marking as Exhibit I for the Deposition record.
19 (Thereupon, Plaintiffs' Exhibit I was entered
20 into the record.)
21 BY MR. CUMMINGS:
22 Q Okay. Here we go. All right. So, what I'm
23 showing you now is what I'm marking as Exhibit I. Please
24 take a second to read this over. It's a three-page
25 document.



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1 So, you can -- let me know when you need me to
2 move up and down, but I'll start here. Now, I'll just
3 make this bigger so you can see it.
4 A There was something on top that I couldn't
5 catch.
6 Q Okay.
7 A Okay.
8 Q So, you can just let me know when you need me
9 to move up and down the screen.
10 A Yeah, you can move.
11 Q Okay.
12 A So, I'm down to, "Thanks again for being
13 transparent and honest."
14 Q Okay.
15 A Okay. Who's sending this, it's not clear.
16 Q I mean, I can just --
17 A Mariana.
18 Q I can scroll up for you. Yeah, no problem.
19 A Okay.
20 Q I mean, you can tell me where to stop, so I'm
21 not exactly sure where you left off or whatever.
22 A Yeah. Carlos Lopez, right there.
23 Q Okay.
24 A Okay. Okay.
25 Q Just going down further. Okay. So, the first



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1 thing I noticed is looking at all of the different
2 e-mail addresses that are throughout this three-page
3 document.
4 I don't think, I ever saw your e-mail address.
5 So, the first question I have for you is, have you ever
6 seen this e-mail chain before?
7 A I saw it after the fact.
8 Q Okay. So, meaning like you didn't see it when
9 it was going back and forth in June 2022 basically?
10 A Correct.
11 Q Okay. All right. Now, based on what you've
12 read and, you know, your position at the company, what
13 is your basic understanding of what's going on here in
14 these e-mails?
15 A So, agents, they were affirming that they were
16 1099 that they wanted to have control -- continue having
17 control of their schedule. And there's a confirmation
18 from Jennifer, agreeing with that, that at no point that
19 was being changed.
20 Q All right. Now, when we go up to the e-mail
21 from Katrina Guerra on June 16th, 2022 to Jennifer.
22 Well, actually the one at 09:50, I'm going to start
23 here. I'll just highlight it.
24 Okay. So, it's actually the other way around.
25 Jennifer is writing to Katrina and says that, "The



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1 communication Alix sent yesterday is simply as you
2 stated to ensure floor coverage at all times."
3 Do you know which communication is being
4 referred to here from Alix?
5 A I'm guessing that there's another e-mail
6 attached to this.
7 Q Okay. And we see an e-mail at the bottom from
8 Alix on June 15th. Do you know if this is the e-mail
9 that Katrina and Jennifer are referring to?
10 A No, I don't know. As you could see, I'm not
11 copied in there.
12 Q Okay. Got it.
13 A Yeah.
14 Q So, either way, it sounds like Alix wanted to
15 make sure that there was floor coverage at all times. Do
16 you know what floor coverage means?
17 A No.
18 Q I noticed that at the bottom that it says that
19 Alix is the call center manager. Is that his position
20 at -- I'm sorry, her, I keep calling her, him, but when
21 I say Alix, I mean her. Is Alix considered the call
22 center manager now for Avant?
23 A Today she's a call center manager.
24 Q Got it. When did she get that position?
25 A I will have to check.



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1 Q What is her duty or her role as the call
2 center manager?
3 A Making sure that we have calls coming in, so
4 that agents are not just there without producing. What
5 else? She is also a producer, so she also gets on the
6 phone and sells, pretty simple.
7 Q Got it. Okay. And so, was Avant having an
8 issue at some point with sales agents not being in the
9 office taking calls?
10 A Not that I'm aware of.
11 Q Okay. And then we see that -- let me see.
12 Katrina wrote to Jennifer first, it looks like that same
13 morning, June 16th, 2022.
14 And she says, "I agree it is a good idea to
15 have protocol in place in the event of an agent needing
16 an adjustment to the schedule that was agreed upon for
17 the week."
18 Do you know what schedule she's referring to
19 that was agreed upon for the week when Katrina says
20 that?
21 A No. Unless she agrees with another agent to
22 be a certain time and the other agent to be a certain
23 time. I don't know what she's referring to.
24 Q Okay. But it's not the case. You're saying
25 that Avant never mandated the producing agents to be in



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1 the office at certain times?
2 A No.
3 Q Okay. And then Katrina's also referring to a
4 protocol in place here, in the event of an agent needing
5 an adjustment. Do you know what protocol Katrina's
6 referring to?
7 A No.
8 Q All right. Okay. Going back up to Jennifer's
9 e-mail response back to Katrina, she said that, "Rey
10 asked that I set up a meeting this afternoon to clarify
11 any questions."
12 Do you remember asking Jennifer to set up a
13 meeting with the producing agents to clarify questions
14 about a schedule?
15 A Not about a schedule, about the communication
16 that was being misinterpreted.
17 Q Okay. What communication was being
18 misinterpreted?
19 A I guess one of these e-mails that the agents
20 were sending to Jennifer.
21 Q But what I'm trying to find out is, what was
22 the original communication like, why were the agents
23 thinking that they had to be on a set schedule.
24 Did something go out from Avant Assurance
25 saying, "Hey, you know, there's a schedule in place now



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1 that everybody needs to be working?"
2 A No.
3 Q No. Okay.
4 A My best guess is like, let's say you have a
5 contractor that is going to go to your house to do
6 something in the roof and they'll tell you, "I'll be
7 there tomorrow at 09:00 a.m."
8 So, my best guess in here what I'm
9 interpreting is agents were trying to agree among
10 themselves, how would they communicate if they were not
11 going to go there to provide their services.
12 Q Okay.
13 A Just as a courtesy, because you want to tell
14 your clients if you're going to go or if you're not
15 going to go.
16 Q Okay. Was there a producing agent that worked
17 for Avant Assurance named Carlos Vasquez?
18 A Carlos, what's the last name?
19 Q Vasquez.
20 A Vasquez, I think we had a Carlos, I don't
21 recall his last name.
22 Q And did you approve Carlos Vasquez to work for
23 Avant -- I'm sorry. You said you don't know the last
24 name. Did you approve an agent named Carlos to work for
25 Avant?



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1 A Approve to work, I'm not sure what you mean by
2 that.
3 Q Did you hire him to work for Avant?
4 A He was a producer like the others.
5 Q Yeah. How did he start producing at Avant
6 Assurance?
7 A How?
8 Q Yeah. Because I mean we keep going through
9 this where you know, I'm trying to figure out how people
10 came to work at Avant and you're saying we didn't hire
11 them because they're independent contractors. So, it
12 gets into this weird thing where it's like, you know,
13 clearly people are working there but you didn't hire
14 them.
15 So, it's like, I don't know what you want to
16 call it. You can call it whatever you want, right, but
17 if people are working as producing agents there, they
18 had to be -- they had to go through some kind of process
19 to start working. They didn't just show up one day and
20 just start, you know, taking calls. I mean, I don't
21 really care what you call it. But how did Carlos, start
22 working at Avant? Who approved him to work there?
23 A So, in any case, it would be that he met with
24 me.
25 Q Okay.



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1 A He told me what he was doing before as an
2 agent and that he was available to produce for the
3 company.
4 Q Okay. And when did you first meet with Carlos?
5 A Definitely that I don't recall.
6 Q Did he start working in 2020, when Avant first
7 opened?
8 A That I don't remember.
9 Q Do you keep records of when people in short --
10 do you keep records of when producing agents start
11 working for Avant?
12 A So, they will typically sign a W-9 form, that
13 they will need to execute and date.
14 Q And does Avant keep a record of the W-9s that
15 the producing agents sign?
16 A We should have records.
17 Q Okay. Is the W-9 form signed every year by
18 the agent?
19 A Every what?
20 Q Is it signed every year that the agents work
21 for Avant?
22 A What do you mean every year?
23 Q Yeah. So, like if -- let's say, for example,
24 Carlos, if he did start working there in 2020, he
25 would've filled out a W-9 in 2020?



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1 A I'm not sure. I'm not sure of when would the
2 W-9 be signed in particular.
3 Q Okay. Is there -- let's just take any
4 producing agent, one of the Plaintiffs. Let's say, you
5 know, Delio Batista. Is there any way that you could
6 check a document that would tell you when he started
7 working with or for Avant?
8 A No.
9 Q Okay. What about Mariana Lopez, is there
10 anything that you could check to tell you when she
11 started working with or for Avant?
12 A No because it could be that she started
13 producing and a couple of days after was when she
14 executed the W-9.
15 Q Okay.
16 A So, the document would not tell us the exact
17 date.
18 Q What about when people are terminated or when
19 they leave Avant, how do you know that particular date?
20 A If they're an employee today, we have track,
21 if they're independent contractor, we don't necessarily
22 have -- we could keep track of that, you know, unless
23 there was a particular action that created the
24 termination or the agreement to happen.
25 Q Got you. Does the person, the producing agent



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1 that you know with the first name Carlos, still work
2 with Avant?
3 A No.
4 Q Why does he no longer work for Avant?
5 A That I don't recall, it was years ago.
6 Q Well, when you say years ago, Avant's only
7 been in existence since 2020, right?
8 A Correct, that's years ago.
9 Q Okay.
10 A Yeah.
11 Q No, I got that. And I was just trying to
12 clarify. So, we're only really working with three years
13 here because it's 2023, and you've been open since
14 September 2020. So, you just don't remember, you said
15 years ago. So, did he start work -- did Carlos, start
16 working there in 2021?
17 A I don't know.
18 Q Got it. And was Carlos fired or did he leave?
19 A That I don't recall.
20 Q Did Carlos have an argument with Alix?
21 A Not that I'm aware of.
22 Q Got it. Did Carlos have an argument with Alix
23 over his working schedule?
24 A Not that I'm aware of.
25 Q Do you know if Carlos came into the office



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1 late one day and was reprimanded by Alix?
2 A No. I don't think so.
3 Q Do you know if Carlos said, "I'm not going to
4 work the hours that have been scheduled and he was let
5 go because he did not work those hours?"
6 A That definitely did not happen.
7 Q Okay. How do you know that didn't happen?
8 A Because they were independent contractors, so
9 we would not terminate them for them refusing to work an
10 agreed schedule that was not even agreed.
11 Q Okay. You previously mentioned that -- well,
12 let me ask you this. When producing agents start
13 working with Avant, how long do you expect them to stay
14 at the time that they begin?
15 A As long as they want to, typically it's a
16 year.
17 Q Okay.
18 A That's the understanding. It would be a year,
19 they're free to stay less amount of time, more amount of
20 time, it is completely up to them.
21 Q Is that a conversation that you have with the
22 producing agents when they first come on that you are
23 granting them a year of time to work there?
24 A No. I was saying, if I'm an agent I want to
25 be somewhere for a certain period of time at least.



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1 Q It would be a year?
2 A That's me, yeah.
3 Q Okay. But you don't talk to the agents when
4 they first come on and say, "Hey, you know, we're just
5 evaluating your performance for this year and then
6 we'll, you know, reevaluate after a year to see how
7 you're doing."
8 A No. Because we don't evaluate performance
9 basically, they sell that's great for them and for us.
10 If they don't, they don't.
11 Q Okay.
12 A Yeah.
13 Q And so, as far as Avant is concerned, are the
14 agent -- producing agents working for a fixed period of
15 time or do they just work until they quit or get fired?
16 A What's the question again?
17 Q As far as Avant is concerned --
18 A Um-hum.
19 Q -- are the producing agents working for a
20 fixed period of time or do they just work until they
21 quit or get fired?
22 A So, yeah, I don't think it's a fixed period of
23 time because there hasn't been an agreement that you
24 working from the month of January, you know. So, it's
25 not a fixed period of time.



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1 Q You previously also mentioned the equipment
2 that the producing agents have to use. So, do they --
3 when they come into the office, let's say the Doral
4 office, do they have a work station that they can work
5 at?
6 A There's multiple work stations, they're free
7 to sit anywhere they want.
8 Q Okay. Are there any assigned desks for the
9 agents?
10 A No.
11 Q Sorry, I didn't hear you.
12 A No.
13 Q You said no?
14 A Yeah. You're talking about the people
15 involved in this case or actual employees that we have
16 today. What is your question related to?
17 Q Yeah. So, I mean I was speaking generally,
18 but let's talk about the Plaintiffs. When the
19 Plaintiffs worked for Avant Assurance, did they have
20 assigned workstations?
21 A No. They were free to see whatever they
22 wanted. One of them may want to be by the window, so he
23 will pick the window. Another one might pick, I don't
24 know, closer to the door then they will be closer to the
25 door. It was totally up to them.



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1 Q Okay. And all they needed to do their work
2 was a computer?
3 A All they, what?
4 Q All they needed to do their work, the
5 producing agents or let's say the Plaintiffs, all the
6 Plaintiffs needed to do their work as producing agents,
7 was a computer?
8 A I think so, yeah.
9 Q Okay. Because Radius is on the computer,
10 correct?
11 A Correct, yeah.
12 Q Okay. Did any of the Plaintiffs use their own
13 personal cell phones to conduct business for Avant?
14 A I think at certain point, I may have seen them
15 using their phones as well placing calls.
16 Q Okay. Did Avant have a policy against the
17 producing agents using their own cell phones to make
18 calls to customers?
19 A To make calls to customer, no.
20 Q Did Avant have a policy of producing agents,
21 including the Plaintiffs, using their cell phones for
22 other reasons, not related to making calls to customers?
23 A For other reasons, can you clarify the
24 question, I don't understand.
25 Q Yeah. I'm just trying to figure out if Avant



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1 had a policy against the insurance agents using their
2 own personal cell phones while they were working at
3 Avant?
4 A No. They -- some of them did actually use
5 their cell phones to place calls.
6 Q Okay. Were there phones available for them to
7 use at the office?
8 A Like physical phones?
9 Q Yes.
10 A No. The system Radius had its own system with
11 phone capabilities with it.
12 Q Were uniforms ever provided to the producing
13 agents in particular the Plaintiffs?
14 A No.
15 Q And by uniforms, were there any polo shirts
16 ever given to them?
17 A No. There's only one uniform in the whole
18 company and I have it, it's one polo shirt, if there's
19 any other uniform out there, it hasn't been authorized
20 by the company.
21 Q Yeah. What does your polo shirt say?
22 A For the record.
23 Q Sorry.
24 A Yeah.
25 Q What is -- what does your polo shirt say?



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1 A Avant Assurance.
2 Q Okay. The office in Kendall, was that space
3 being leased by Avant?
4 A Leased by Avant, yes.
5 Q Were the -- were any of the Plaintiffs
6 required to pay any part of that lease for that office
7 space in Kendall?
8 A To pay?
9 Q Yeah. Were any of the Plaintiffs in this case
10 required to pay any part of the lease for the office
11 space in Kendall?
12 A No.
13 Q What about the Doral office, were any of the
14 Plaintiffs required to pay any of the office space for
15 the lease in Doral?
16 A No.
17 Q What did the agents need to bring to work with
18 them every day to do their jobs?
19 A Their voice pretty much and, you know,
20 computer skills, right, they need to be able to type.
21 That's it.
22 Q Okay. What was your impression of Delio
23 Batista as a sales agent?
24 A My impression?
25 Q Yes.



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1 A Do you want to be more specific?
2 Q I mean, my understanding is that you didn't
3 do any kind of progress reports or evaluations of the
4 sales -- the producing agents, right?
5 A That's correct, yeah.
6 Q Okay. So, they didn't get like yearly reviews
7 or monthly reviews or anything like that?
8 A No.
9 Q Okay. But I mean, did you have an opinion of
10 Delio Batista as a sales agent?
11 A No. Because I mean, it's not like I was
12 sitting there listen to him on his selling skills, so, I
13 wouldn't be able to form an opinion on him.
14 Q What about the results of his work though?
15 What did you think about the results of his work?
16 A He was good --.
17 MR. CUETO: Asked and answered.
18 A -- enough for the company.
19 MR. CUETO: Yeah. Okay. You can answer, but
20 I just object to the extent you know.
21 BY MR. CUMMINGS:
22 Q Yeah. Sorry, I don't -- I'm not sure I
23 actually heard what you said Mr. Cortes?
24 A I guess, the same as the other agents. I mean
25 he was producing and we were okay with his production.



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1 Q Did Delio Batista work for any other insurance
2 brokers or -- I'm sorry, insurance agencies at the time
3 he worked for Avant?
4 A That's a question you would need to ask him.
5 Q Okay. If I ask you the same question about
6 your impression of the other Plaintiffs, would it be the
7 same answer that you gave for Delio Batista?
8 A Yeah. I mean they were producing and we were
9 both happy with production, them as producer and us as
10 an agency.
11 Q Now, you previously mentioned that Rafaela
12 Valiente worked for another insurance agency called CR,
13 correct?
14 A She had a contract with CR, yes.
15 Q And that at some point she stopped working for
16 Avant for a month went to a warehouse and then came
17 back, correct?
18 A That's what she said, correct.
19 Q Okay. What about Mariana Lopez, do you know
20 if Mariana Lopez ever worked for any other insurance
21 agency while she was working for Avant?
22 A That I don't know.
23 Q And what about Carlos Lopez, do you know if he
24 worked for any other insurance agency before working for
25 Avant?



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1 A That I don't know. Those are questions you
2 need to ask them.
3 Q Okay. As far as you know, did Rafaela
4 Valiente -- never mind, sorry. As far as you know, did
5 Carlos Lopez work as an insurance agent before he came
6 to Avant?
7 A Not that I'm aware.
8 Q Okay. And when Carlos first started working
9 with Avant, did he have to be trained on how to do his
10 job as a producing agent?
11 A No. He needed to hold a license.
12 Q Did Avant pay for him to get his license?
13 A If we pay him for him to get the license, no.
14 Probably he paid on his own.
15 Q Okay. And Mariana Lopez, do you know if she
16 worked as an insurance agent prior to working with Avant
17 Assurance?
18 A That I don't know.
19 Q Okay. Did Mariana Lopez have to be trained on
20 how to be a producing sales agent for Avant when she
21 first started working for Avant?
22 A Not that I'm aware of. Maybe train on the
23 platform like, you start driving for Uber, you don't
24 know the platform. Yeah, we show you the platform
25 around.



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1 Q How much money did Avant Assurance gross in
2 the year 2020?
3 A In the year?
4 Q 2020?
5 A That I don't recall, but it was definitely not
6 a whole lot of money.
7 Q Okay. Do you know if it was more or less than
8 \$500,000?
9 A Way less than that.
10 Q Okay. And I mean -- I don't mean profit, I
11 just mean gross income?
12 A Yes.
13 Q Okay. 2021, did Avant Assurance gross more or
14 less than \$500,000?
15 A '21, I would need to confirm. I don't know
16 right now, to be honest.
17 Q What would you have to refer to figure that
18 answer out?
19 A Tax returns.
20 Q And then last year in 2022, did Avant
21 Assurance make more or less than \$500,000 gross income?
22 A Probably was more than 500.
23 Q All right. So, in -- Avant Assurance is
24 currently suing two of the Plaintiffs in this case,
25 which would be Mariana Lopez and Carlos Lopez, correct?



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Delio Batista, Carlos Lopez, Mariana Lopez, Rafaela Valiente vs Avant Assurance
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1 A Yes.
2 Q Okay. And why is Avant Assurance suing -- I'm
3 sorry, why is Avant suing Mariana and Carlos Lopez?
4 A I think that's pertinent to the other case and
5 not to this one.
6 Q Okay. So, you're not going to answer the
7 question?
8 A In the other case, I may be able to answer and
9 in this case that may not be relevant.
10 Q Okay. I mean --
11 A I don't know if I should answer. That's my
12 answer.
13 Q No, I understand.
14 A Yeah.
15 Q I mean, I understand. I mean, here's the
16 thing. I mean, just let me kind of like speak to you
17 through your Attorney. I'm not sure if you feel like
18 you've been here for a long time, but the answer to that
19 question I can still always get, so if you don't mind
20 coming back, it's fine.
21 But you know, like I'm going to get the answer
22 to the question, so, because there is another lawsuit,
23 so I'm just trying to kind of maybe like save us
24 sometime, but if it doesn't matter to you, it kind of
25 doesn't matter to me either.



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1 I'm almost done, but I can definitely ask you
2 these questions in another setting.
3 A Yeah, that's fine.
4 Q Okay. All right. At this time -- let me just
5 double check and make sure I have anything else. Just
6 very quickly. Delio Batista, why does he no longer work
7 for Avant Assurance?
8 A Because he tried to assault a former employee.
9 I don't know if you know that.
10 Q No, I didn't know that. Who was that?
11 A Who was what?
12 Q Who did he -- who did Delio try to assault?
13 A Our former CFO.
14 Q Yeah. Who was that?
15 A The person's name you're asking?
16 Q Yes.
17 A Okay. You could just ask Alberto Darsa
18 (phonetic).
19 Q Were you -- did this incident take place at
20 the Doral office?
21 A We were in a Zoom meeting and Delio was at the
22 office and Alberto Darsa was also at the office.
23 Q You were not present at the office?
24 A I was not there in the office.
25 Q Okay. Were you able to observe what was



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1 happening over Zoom between Delio and Alberto?
2 A I heard the whole conversation because it
3 happened over Zoom.
4 Q Okay. What -- can you basically just tell me
5 what happened?
6 A So, he told the former CFO that different than
7 Carlos, that they go to his office to threaten to
8 assault him. He wouldn't have even invited him. He
9 would've just done it on the spot and he was willing to
10 do it. And then he got up and left.
11 Q Delio got up and left?
12 A Yes.
13 Q Okay. So, Delio didn't do anything physical,
14 he just verbally --
15 A Threatened to assault, yeah.
16 Q Threatened to assault Alberto?
17 A Correct.
18 Q Got it. Okay. And do you know what the
19 argument they were having was about?
20 A Personality issues, I don't know.
21 Q Was it about payment at all, did Delio feel
22 like he wasn't getting paid money?
23 A No, not at all about payments. And just so
24 you know Alberto wanted to press charges on Delio and
25 Carlos.



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1 Q Okay. Did you talk Alberto out of it?
2 A I did not.
3 Q Why didn't Alberto press charges?
4 A That I don't know.
5 Q Why does Alberto no longer work for Avant?
6 A Because of his performance -- he was new to
7 the company and it was a mutual agreement and he also
8 didn't feel comfortable being in an environment where
9 agents were threatening him to assault him. So, he
10 basically resigned.
11 Q Now, on the Zoom call that you were referring
12 to previously, was Carlos in the office also, Carlos
13 Lopez?
14 A Carlos, I don't think he was part of that Zoom
15 meeting. So, he had threatened Alberto before that
16 meeting and he was no longer producing for us because of
17 that reason.
18 Q Got it. Okay. So, who made the decision to
19 fire Delio?
20 A To fire or to terminate his agreement.
21 Q Sure. Who made --
22 A Terminate his agreement, that was me.
23 Q And you terminated Delio's agreement because
24 of the incident with Alberto?
25 A Correct.



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1 Q Not because Delio was no longer producing?
2 A No, he was producing.
3 Q Okay. Got it. Now, Carlos, who made the
4 decision to terminate his agreement?
5 A Well, he basically terminated his own
6 agreement and then I basically confirmed that his
7 agreement was being terminated to him.
8 Q Okay. But why, what was the reason?
9 A Because he was going to get into a fight with
10 Alberto.
11 Q How do he --
12 A He walked out on his own and he sent me a text
13 message saying that he no longer wanted to continue
14 producing for the agency because he was going to go
15 ahead and hit the other person in charge in him.
16 Q Okay. And did you -- the text message that
17 Carlos Lopez sent you, did you accept that as his
18 resignation?
19 A I had a conversation with him after he sent me
20 a text message. It was a WhatsApp message, not a text
21 message because that makes a difference. And in the
22 confirmation, he basically reaffirmed that you know, he
23 was very close to hit the other person.
24 Q Okay. Meaning Alberto?
25 A Alberto, correct.



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1 Q How did you get along with Alberto?
2 A The same, I get along fine with everybody.
3 Q Okay. Did you want to hit Alberto?
4 A No.
5 Q Okay. All right. And Mariana -- well, no I
6 already know about Mariana. Rafaela, how did her
7 contract with Avant end?
8 A Can I ask you for a quick break, just got to
9 use the restroom quickly.
10 Q I mean, if you want, this is actually like my
11 last question, so I don't know if you want to just
12 finish it up now.
13 A All right. Let's try.
14 Q It's up to you. That's fine. No, go yeah, I
15 mean --
16 A Yeah. I'll take five minutes not 10, 5.
17 Q Okay.
18 A Okay. I'll be back.
19 Q Okay.
20 (Thereupon, a short discussion was held off
21 record.)
22 (Deposition resumed.)
23 BY MR. CUMMINGS:
24 Q Okay. And I was asking about Ra --
25 A Rafaela.



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1 Q -- Rafaela Valiente, yeah, how did her
2 contract terminate with Avant?
3 A You know, to be honest, so I was approached by
4 one of our partner agencies and they approached me
5 because Rafaela went to them and she wanted to work for
6 them.
7 I don't know if an employer, as an independent
8 agent but she basically approached them and I'm not sure
9 whether she told me at the end that she wanted to go
10 work for them or that she just resigned and did not go
11 to work for them.
12 Q Okay. So, essentially --
13 A I don't recall.
14 Q Okay.
15 A Yeah.
16 Q Okay. Got it. Was that in 2022?
17 A That was last year.
18 Q So, essentially Rafaela just went to go work
19 for another agency?
20 A Yeah. I don't know at the end that's what she
21 ended up doing or not, but that's what the agency told
22 me and that's what she said.
23 Q All right. And at the end of the day you know,
24 this lawsuit is about my client saying that they were
25 not paid overtime bonuses and commissions.



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1 As far as the bonuses are concerned, is it
2 Avant's position that the Plaintiffs are not owed
3 bonuses and specifically Delio, Carlos, and Maria -- I'm
4 sorry, the Delio, Rafaela, and Carlos because they were
5 not producing at the time the bonuses were due?
6 A Correct.
7 Q Okay. Were they paid bonuses in the past by
8 Avant Assurance?
9 A So, if Avant paid any bonuses to them?
10 Q Right. In 2020, 2021?
11 A Well, in 2022 we paid them bonuses.
12 Q They were paid bonuses?
13 A Yes.
14 Q Is there a record of the bonuses that were
15 paid to them?
16 A Yeah. There's probably a record.
17 Q Okay. Now, here you say probably again, but
18 is there something that you can go back and refer to
19 that shows the bonuses that were paid out to Delio,
20 Rafaela -- well, all of them actually, all four?
21 A Yeah.
22 Q Okay. All right. Now, as far as commissions
23 are concerned, my clients said that they did not receive
24 all of their commissions. Did Avant pay the Plaintiffs
25 all of their commissions?



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1 A Correct.
2 Q Okay. And is there a record of all of the
3 commissions that were paid to my clients from 2000 to
4 2022?
5 A Yes.
6 Q Okay. Has that information already been
7 turned over to us?
8 A I believe so.
9 Q Was that turned over in the form of
10 spreadsheets?
11 A Yeah, it was an Excel form.
12 MR. CUETO: Yeah. And just the -- I think it
13 was that, that was a very long spreadsheet with it
14 had like 6,000 rows of data.
15 And in addition, I think there was kind of
16 like a summary of how much was paid to each and
17 that was like in a little graph.
18 MR. CUMMINGS: Got it. Okay.
19 BY MR. CUMMINGS:
20 Q Now, did any of the Plaintiffs ever complain
21 to you that they not -- did not receive their
22 commissions?
23 A No.
24 Q Did any of the complains -- I'm sorry, did any
25 of the Plaintiffs ever complain to anybody at Avant that



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1 they did not receive their commissions, before they
2 stopped working there?
3 A Not that I'm aware of. I mean, it is to our
4 interest for them to get paid in a timely manner. So,
5 that they con -- so, that they could continue producing
6 for the agency. So, obviously we wanted them to get
7 paid at all times.
8 Q All right. And did any of the Plaintiffs
9 complain that they did not receive their bonuses before
10 they stopped working at Avant?
11 A No.
12 Q Okay.
13 MR. CUMMINGS: I have no further questions.
14 MR. CUETO: Okay. I have no questions.
15 MR. CUMMINGS: All right. Thank you for your
16 time.
17 THE WITNESS: Thank you, Toussaint
18 MR. CUETO: All right. Thank you.
19 MR. CUMMINGS: All right. Ashley --
20 THE WITNESS: Yeah.
21 MR. CUETO: You have the right to read or
22 waive, Reinier, if you think that, you know, there
23 may be some inaccuracies, you can read your
24 testimony. If not, you can just waive and let the
25 Court Reporter take care of it.



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1 THE WITNESS: I'm sorry, I didn't hear that.
 2 MR. CUETO: You can read or waive the
 3 deposition transcript. Usually if you -- people
 4 would read it if they think there may be some
 5 inconsistencies or that their statements weren't
 6 taken down properly, that usually involves
 7 technical terms.
 8 And I don't think this involves technical
 9 terms where or that there was unclear testimony,
 10 but it's up to you though, if you want to read it
 11 to make sure everything said was accurate and
 12 you're also free to waive it. That's up to you.
 13 THE WITNESS: Free to what?
 14 MR. CUETO: Waive it, like not read it.
 15 THE WITNESS: Well, yeah, I'm not sure what
 16 was -- which notes were taken down.
 17 MR. CUETO: Okay. Yeah, then we'll read.
 18 THE COURT REPORTER: Read. Okay. And I
 19 assume he would be reading through your office
 20 Mr. Cueto?
 21 MR. CUETO: Yes.
 22 THE COURT REPORTER: Okay, thank you. And
 23 then Counsel, Mr. Cummings, before we go off the
 24 record, you did put some exhibits on the record, I
 25 have put my contact information in the chat. If

1 you could forward those when you're able that would
 2 be a great help. At this time -
 3 MR. CUETO: And to the extent, I just want to
 4 say Mr. Cortes, to the extent you change and of
 5 your testimony counsel has the right to bring you
 6 back and ask you why you changed it.
 7 THE WITNESS: Okay.
 8 THE COURT REPORTER: Okay at this time if no
 9 one else has anything to add to the record, we can
 10 go off the record.
 11 MR. CUMMINGS: Okay thanks a lot.
 12 (Deposition concluded at 02:19 p.m.)
 13 (Reading and signing of the deposition by the
 14 witness has been reserved.)
 15
 16
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 25

1 CERTIFICATE OF REPORTER
 2 STATE OF FLORIDA
 3 COUNTY OF SARASOTA
 4
 5 I, Ashley Craft, Court Reporter and Notary Public
 6 for the State of Florida, do hereby certify that I was
 7 authorized to and did digitally report and transcribe
 8 the foregoing proceedings, and that the transcript is a
 9 true and complete record of my notes.
 10 I further certify that I am not a relative,
 11 employee, attorney or counsel of any of the parties, nor
 12 am I a relative or employee of any of the parties'
 13 attorneys or counsel connected with the action, nor am I
 14 financially interested in the action.
 15
 16 Witness my hand this 12th day of May, 2023.


Ashley Craft, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 3 COUNTY OF SARASOTA
 4
 5 I, Ashley Craft, the undersigned authority, certify
 6 that Reinier Cortes, appeared before me remotely
 7 pursuant to Florida Supreme Court Order AOSC20-23 and
 8 was duly sworn on the 11th day of April, 2023.
 9
 10 Witness my hand this 12th day of May, 2023.


Ashley Craft, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA
Commission No.: HH 309778
Commission Exp: January 6, 2027

1 DATE: May 12, 2023
 2 TO: Reinier Cortes
 3 C/O
 4 Santiago Cueto, Esquire
 5 Cueto Law Group
 6 3100 Ponce de Leon Blvd., Ste 1250
 7 Coral Gables, FL 33134
 8
 9 IN RE: Delio Batista, et al. v. Avant Assurance Inc.
 10 CASE NO: 1:22-CV-22671-Altonaga/Torres
 11
 12 Dear Mr. Cortes,
 13
 14 Please take notice that on April 11, 2023, you gave
 15 your deposition in the above-referenced matter. At that
 16 time, you did not waive signature. It is now necessary
 17 that you sign your deposition. You may do so by
 18 contacting your own attorney or the attorney who took
 19 your deposition and make an appointment to do so at
 20 their office. You may also contact our office at the
 21 below number, Monday - Friday, 9:00 AM - 5:00 PM, for
 22 further information and assistance.
 23 If you do not read and sign your deposition within
 24 thirty (30) days, the original, which has already been
 25 forwarded to the ordering attorney, may be filed with
 the Clerk of the Court.
 If you wish to waive your signature, sign your name
 in the blank at the bottom of this letter and promptly
 return it to us.
 Very truly yours,
 Ashley Craft, Court Reporter
 Universal Court Reporting
 (954) 712-2600
 I do hereby waive my signature.
 Reinier Cortes

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1 Errata Sheet
 2
 3 NAME OF CASE: Delio Batista, Carlos Lopez, Mariana Lopez, Rafaela Valiente vs Avant Assurance
 4 DATE OF DEPOSITION: 04/11/2023
 5 NAME OF WITNESS: Reinier Cortes
 6 Reason Codes:
 7 1. To clarify the record.
 8 2. To conform to the facts.
 9 3. To correct transcription errors.
 10 Page ____ Line ____ Reason ____
 11 From ____ to ____
 12 Page ____ Line ____ Reason ____
 13 From ____ to ____
 14 Page ____ Line ____ Reason ____
 15 From ____ to ____
 16 Page ____ Line ____ Reason ____
 17 From ____ to ____
 18 Page ____ Line ____ Reason ____
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 22 Page ____ Line ____ Reason ____
 23 From ____ to ____
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 25

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